

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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VALENTIA VILLETTI and FAIZA JIBRIL, M.D.,

Plaintiffs, Case No.:
1:18-cv-10200-VSB-KNF

-against-

GUIDEPOINT GLOBAL, LLC,

Defendant.

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One Battery Park Plaza
New York, New York

October 3, 2019
10:05 p.m.

EXAMINATION BEFORE TRIAL of the
Plaintiff, FAIZA JABRIL, taken by the
Defendant in the above-entitled action, held
at the above time and place, pursuant to Case
Management Plan, taken before Stephen P.
Sudano, a shorthand reporter and Notary
Public within and for the State of New York.

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<p style="text-align: right;">Page 2</p> <p>2 APPEARANCES:</p> <p>3</p> <p>4 LICHTEN & BRIGHT, P.C.</p> <p>5 Attorneys for Plaintiffs</p> <p>6 387 Park Avenue South</p> <p>7 New York, New York 10016</p> <p>8</p> <p>9 BY: STUART LICHTEN, ESQ.</p> <p>10</p> <p>11 GORDON REES SCULLY MANSUKHANI, LLP</p> <p>12 Attorneys for Defendant</p> <p>13 1 Battery Park Plaza, 28th Floor</p> <p>14 New York, New York 10004</p> <p>15</p> <p>16 BY: DAVID GRECH, ESQ.</p> <p>17</p> <p>18 ALSO PRESENT:</p> <p>19 Catherine Smith, Esq., general counsel for</p> <p>20 Guidepoint Global, LLC.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>2 FAIZA JIBRIL, the witness herein,</p> <p>3 having been first duly sworn before a Notary</p> <p>4 Public of the State of New York, was examined</p> <p>5 and testified as follows:</p> <p>6 EXAMINATION BY</p> <p>7 MR. GRECH:</p> <p>8 THE REPORTER: Please state your</p> <p>9 name for the record.</p> <p>10 THE WITNESS: Faiza Jibril.</p> <p>11 THE REPORTER: Do you presently</p> <p>12 reside at 1191 Ocean Avenue, PH4,</p> <p>13 Brooklyn, New York 11230?</p> <p>14 THE WITNESS: Yes.</p> <p>15 Q. Good morning, Dr. Jibril.</p> <p>16 A. Good morning.</p> <p>17 Q. My name is David Grech. I'm with</p> <p>18 the firm Gordon, Rees, Scully, Mansukhani,</p> <p>19 and I'm senior counsel in their employment</p> <p>20 group, and we represent Guidepoint Global,</p> <p>21 LLC.</p> <p>22 I'm just going to give you a few</p> <p>23 instructions before we begin. If you have</p> <p>24 any questions about my instructions, just</p> <p>25 stop me and let me know, and I'll try to</p>
<p style="text-align: right;">Page 3</p> <p>2 STIPULATIONS:</p> <p>3 IT IS HEREBY STIPULATED AND AGREED by and</p> <p>4 between the attorneys for the respective</p> <p>5 parties herein, that filing, sealing and</p> <p>6 certification, and the same are, hereby</p> <p>7 waived.</p> <p>8</p> <p>9 IT IS FURTHER STIPULATED AND AGREED that all</p> <p>10 objections except as to the form of the</p> <p>11 question, shall be reserved to the time of</p> <p>12 the trial.</p> <p>13</p> <p>14 IT IS FURTHER STIPULATED AND AGREED that the</p> <p>15 within deposition may be signed and sworn to</p> <p>16 by an officer authorized to administer an</p> <p>17 oath, with the same force and effect as if</p> <p>18 signed and sworn to before the Court.</p> <p>19 xxxxx</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 F. JIBRIL, M.D.</p> <p>2 better explain them.</p> <p>3 A. Okay.</p> <p>4 Q. This is a deposition. The</p> <p>5 expectation is that I ask questions with</p> <p>6 answers from you. The questions will be</p> <p>7 about the underlying lawsuit as against</p> <p>8 Guidepoint. If you don't understand not</p> <p>9 only just my instructions but any of the</p> <p>10 questions that I might ask as we go along,</p> <p>11 please say so, ask me to rephrase it, and I</p> <p>12 will attempt to do so.</p> <p>13 We have a reporter with us here</p> <p>14 today, so I would ask that your responses be</p> <p>15 verbalized. No nodding or gestures because</p> <p>16 the reporter must take down your responses</p> <p>17 to create a record.</p> <p>18 On that note, so that record is</p> <p>19 clear, if you can sort of guess where my</p> <p>20 question might be going or the end of it</p> <p>21 might be, I'll just ask you for the sake of</p> <p>22 the record, again, for me to finish it, and</p> <p>23 then you can respond.</p> <p>24 If you need a break at any time,</p> <p>25 please just let me, let your counsel know,</p>

<p style="text-align: right;">Page 6</p> <p>1 F. JIBRIL, M.D. 2 and we'll accommodate you. The only 3 condition on that is that if there's a 4 question pending at that point, we'd just 5 ask you to answer it and then we would take 6 your break. 7 A. Okay. 8 Q. Do you have any questions about 9 those instructions? 10 A. No. 11 Q. Do you have any instructions about 12 this process at all? 13 A. No. 14 Q. Do you know why we're here today? 15 A. Yes. 16 Q. Okay. 17 Why do you believe we're here 18 today? 19 A. We're here to -- as part of the 20 proceedings in the lawsuit Ms. Valletti and 21 I versus Guidepoint Global. 22 Q. Okay. 23 So you're suing Guidepoint Global. 24 A. Yes. 25 Q. Okay.</p>	<p style="text-align: right;">Page 8</p> <p>1 F. JIBRIL, M.D. 2 Q. Have you ever been party to a 3 lawsuit before? 4 A. Divorce and custody proceedings. 5 Q. Okay. 6 Separate and apart from divorce 7 and custody proceedings, have you ever been 8 party to a lawsuit? 9 A. No. 10 Q. And I'm referring to as a doctor. 11 You're an M.D.? 12 A. Yes. 13 Q. Can you tell us where you went to 14 medical school? 15 A. I did my undergraduate at 16 University of East Anglia and subsequently 17 received my medical degree at ABU. 18 Q. What does ABU stand for? 19 A. Ahmadu Bayero University. 20 Q. Could you spell that for the 21 reporter? 22 A. A-H-M-A-D-U B-A-Y-E-R-U [sic]. 23 Q. And so you earned your medical 24 degree from ABU. 25 A. Yes.</p>
<p style="text-align: right;">Page 7</p> <p>1 F. JIBRIL, M.D. 2 Why are you suing Guidepoint 3 Global? 4 A. Failure to hire or hiring 5 discrimination. 6 Q. Okay. 7 So it's your position that 8 Guidepoint failed to hire you? 9 A. Yes. 10 Q. And Ms. Valletti has separate but 11 related claims. 12 A. Yes. 13 Q. Why do you feel that Guidepoint 14 failed to hire you? 15 A. Based on my gender. 16 Q. Okay. 17 What gives you that belief? 18 A. I believe that I was a 19 well-qualified candidate for the position. 20 The hiring managers at the time, 21 Ms. Valletti and Bouker Pool were 22 recommending me to be hired. 23 Q. Dr. Jibril, have you ever been 24 deposed before? 25 A. No.</p>	<p style="text-align: right;">Page 9</p> <p>1 F. JIBRIL, M.D. 2 Q. And where is ABU located? 3 A. Zaria, Nigeria. 4 Q. And when did you graduate from ABU 5 with your M.D.? 6 A. 2012. 7 Q. And what was the next step in the 8 course of your medical education/profession 9 after graduation in 2012? 10 A. So I did some training in 11 obstetrics and gynecology at -- the name of 12 the hospital is New Somerset Hospital in 13 Cape Town. 14 Q. South Africa? 15 A. Yes. 16 Q. So you trained at New Somerset 17 Hospital beginning in 2012, around about? 18 A. Around about. 19 Q. And how long did that training 20 last? 21 A. A year. 22 Q. Okay. 23 And after your training in Cape 24 Town, what was the next step in your medical 25 education career?</p>

<p style="text-align: right;">Page 10</p> <p>1 F. JIBRIL, M.D. 2 A. I moved to the United States and 3 shortly thereafter started working for my 4 current employer, The Expert Institute. 5 Q. And -- I'm sorry, you moved to the 6 United States. 7 Where were you born? 8 A. I was born in Egypt. 9 Q. Had you lived in Africa since 10 birth through medical school? 11 A. No, I -- my family traveled quite 12 a lot, but I did most of my primary and 13 secondary education in the UK, Scotland and 14 England. 15 Q. And forgive me. The school you 16 mentioned before ABU, what was that school? 17 A. University of East Anglia. 18 Q. And where is that located? 19 A. In Norwich, England. 20 Q. So schooling in Europe, UK, and 21 Scotland, Nigeria for medical school? 22 A. Yes. 23 Q. South Africa for training? 24 A. Yes. 25 Q. And that brings you to 2013:</p>	<p style="text-align: right;">Page 12</p> <p>1 F. JIBRIL, M.D. 2 Q. Fair question because it was an 3 awkward question from me. 4 Where were you working when you 5 worked for Expert Institute? 6 A. I was working at their 7 headquarters. 8 Q. Okay. 9 And where is their headquarters 10 located? 11 A. At the time, it was 75 Maiden 12 Lane. 13 Q. In Manhattan? 14 A. Yes. 15 Q. And were you living in Brooklyn at 16 that time? 17 A. Yes. 18 Q. Okay. Thank you. 19 And Expert Institute has its 20 headquarters in New York City. Does it have 21 other offices? 22 A. Yes. 23 Q. Okay. 24 Is it nationwide? International? 25 A. International.</p>
<p style="text-align: right;">Page 11</p> <p>1 F. JIBRIL, M.D. 2 Moved to the United States. 3 A. Yes. 4 Q. And you now at that point started 5 work for which entity? 6 A. The Expert Institute. 7 Q. And in what capacity did you begin 8 working at Expert Institute? In around 9 about 2013. 10 A. Initially, I worked part-time as 11 part of the content team. I was working on 12 marketing material. 13 Q. Okay. 14 And at some point, did your 15 position at Expert Institute change? 16 A. Yes. 17 Q. And when did it first change? 18 A. About four months into my 19 employment around April of 2013. 20 Q. I'm sorry. When you were working 21 for Expert Institute, where were you 22 located? 23 A. In Brooklyn -- I'm sorry. Can I 24 clarify? You mean where was the company, or 25 where did I live?</p>	<p style="text-align: right;">Page 13</p> <p>1 F. JIBRIL, M.D. 2 Q. Is it sort of in the same sphere 3 as Guidepoint? Doing the same sort of work? 4 A. No. So our clients are attorneys, 5 law firms, litigators. 6 Q. You have a CLE department? 7 A. Some of our, um, webinars can be 8 used for CLE credit depending on which 9 state. We're not accredited for all states. 10 Q. Understood. Okay. 11 So then bringing -- going back to 12 April 2013, you're at Expert Institute for 13 about four months. You said your role there 14 had changed? 15 A. Yes. 16 Q. How did your role change? 17 A. It expanded to working in the 18 research team. 19 Q. Were you still part-time at this 20 point? 21 A. I was now full-time. 22 Q. And you were now part of the 23 research team? 24 A. Yes. 25 Q. And what was your compensation</p>

<p style="text-align: right;">Page 14</p> <p>1 F. JIBRIL, M.D. 2 starting in April 2013 when you became 3 full-time? 4 A. \$50,000 a year. 5 Q. Was that total or is that base? 6 A. Total. 7 Q. Okay. 8 So how long did you work full-time 9 as part of Expert Institute's research team? 10 A. Um, roughly three years with 11 promotions along the way. 12 Q. Could you walk us through those 13 promotions, you know, in sequence? 14 A. Yep. 15 Q. And when they occurred? 16 A. Sure. So the rest of 2013, I was 17 an associate on the research team. I was 18 promoted to senior medical research 19 associate by the end of 2013. 20 In 2014, I was overseeing the 21 entire department. 22 Q. And which department is this, the 23 research -- 24 A. Medical research team. 25 Q. Medical research team.</p>	<p style="text-align: right;">Page 16</p> <p>1 F. JIBRIL, M.D. 2 promotion to associate in the research 3 department or from associate to senior 4 medical research associate: How did that 5 affect your compensation at Expert? 6 A. The first promotion, I think my 7 base salary increased from \$50- to \$60- 8 with -- 9 Q. This is at senior -- when you 10 became senior medical research associate? 11 A. Correct. 12 Q. Okay. 13 And I'm sorry. You're going to 14 say? 15 A. And there were quarterly bonuses 16 based on performance totaling around \$5,000 17 by the end of 2014. 18 Q. \$5,000 total for the year or for 19 quarter? 20 A. For the year. 21 Q. And did you earn that bonus for 22 2014? 23 A. Yes. 24 Q. Okay. 25 And then if I have this right, you</p>
<p style="text-align: right;">Page 15</p> <p>1 F. JIBRIL, M.D. 2 And this is research to develop 3 content for these presentations? 4 A. Part of it, but a diminishing part 5 of it. The majority of my responsibilities 6 was screening, vetting, and connecting our 7 clients with medical experts for their 8 cases. I was still developing content for 9 webinars. 10 Q. And when you say experts for their 11 cases, we're talking about expert witnesses 12 for litigation and things of that nature? 13 A. Correct. 14 Q. All right, so that's in 2013. 15 How long did you serve in that 16 capacity overseeing the medical research 17 department? 18 A. I would say up in the end of 2016. 19 Q. Okay. 20 And what happened then? 21 A. I was promoted to a customer -- 22 account management role, so being more 23 client-facing, helping the sales team win 24 new business. 25 Q. Forgive me. Going back to your</p>	<p style="text-align: right;">Page 17</p> <p>1 F. JIBRIL, M.D. 2 were promoted to a capacity where you were 3 overseeing the entire medical research 4 department in 2014? 5 A. Yes. 6 Q. Did that come with a change in 7 your compensation? 8 A. Yes, by that point, I was earning 9 \$70,000. 10 Q. Any bonus structure associated 11 with that? 12 A. Again, quarterly bonuses. 13 Q. The same amounts, \$5,000? 14 A. Uh-huh. 15 Q. And did you earn a bonus in your 16 role as overseeing medical research 17 department? 18 A. And just to clarify that role -- 19 Q. Please. 20 A. -- was associate director of 21 medical research. 22 Q. And you held that beginning in 23 2014? 24 A. 2016. 25 Q. Through 2016 or starting in 2016?</p>

<p style="text-align: right;">Page 18</p> <p>1 F. JIBRIL, M.D. 2 A. Starting in 2016, that's when my 3 title changed to associate director. 4 Q. Okay. 5 And you helped -- was there a 6 point when you were in the medical research 7 department overseeing work there but not in 8 the title of associate director? 9 A. Yes, informally. 10 Q. Okay. 11 A. As the team grew. 12 Q. Okay. 13 So at the end of -- you were 14 senior medical research associate until the 15 end of 2013? 16 A. 2014. 17 Q. Until the end of 2014, okay. 18 And then in 2014, you were 19 overseeing the medical research department? 20 A. Yes. 21 Q. Informally at first? 22 A. Informally at first and -- 23 Q. And then -- I'm sorry. 24 A. And then my title changed to 25 associate director.</p>	<p style="text-align: right;">Page 20</p> <p>1 F. JIBRIL, M.D. 2 Q. Okay. 3 What happened next in your career 4 at Expert? 5 A. At around -- around April of 2017, 6 I formally moved to the business development 7 team. 8 Q. Did that come with a change in 9 compensation? 10 A. It did. So my base salary stayed 11 the same, but I then was earning commissions 12 based on my performance. 13 Q. Okay. 14 How long did you stay part of the 15 business development team, which started in 16 April 2017? 17 A. I am still currently on the 18 business development team. 19 Q. Okay. 20 Do you have a title? 21 A. My current title is vice president 22 of enterprise. 23 Q. And what's your current 24 compensation as vice president of enterprise 25 for Expert?</p>
<p style="text-align: right;">Page 19</p> <p>1 F. JIBRIL, M.D. 2 Q. Okay. 3 And when -- 4 A. Of medical research. 5 Q. And when did that formal title 6 change occur? 7 A. I believe toward the end of 2016. 8 Q. Okay. 9 So from 2014 through the end of 10 2016, you were overseeing the medical 11 research department. But then at the end of 12 2016, you were the named associate director 13 of medical research? 14 A. Yes. 15 Q. And then when did you take on the 16 title of account manager? 17 A. It was never a formal title. I 18 just started doing it, essentially, helping 19 our business development team, and I did 20 that as my sole responsibility for the 21 beginning part of 2017. 22 Q. Did that affect your compensation? 23 A. No. 24 Q. So you were still at \$70,000? 25 A. Yes.</p>	<p style="text-align: right;">Page 21</p> <p>1 F. JIBRIL, M.D. 2 A. It will be, or should be, about 3 \$333,000 by end of year. 4 Q. By end of 2019? 5 A. Yes. 6 Q. And I'm sorry. You said, "should 7 be"? Why is that? 8 A. If I hit all my quotas. 9 Q. The commissions? 10 A. Exactly. 11 Q. Do you have a base? 12 A. Yes. 13 Q. What's your base? 14 A. Current base is \$140,000. 15 Q. So from 2017 to date, you're part 16 of the business development team? 17 A. Yes, but I did not enter the role 18 of vice president until the beginning of 19 2019, so January of 2019. 20 Q. Thank you. That was going to be 21 my next question. 22 A. That is when my base was increased 23 to \$140,000. 24 Q. Could you just walk us through 25 April 2017 through your promotion to vice</p>

<p style="text-align: right;">Page 22</p> <p>1 F. JIBRIL, M.D. 2 president and then -- 3 (Whereupon, an employee of Gordon 4 & Rees, LLP entered the room, and a 5 discussion was held off the record at 6 this time.) 7 Q. From 2017 -- could you walk us 8 through 2017 in April to January 2019, any 9 changes in compensation -- 10 A. Yes. 11 Q. -- or titles? 12 A. So I started on the business 13 development team Q2 of 2017, so right around 14 April. Um, from April to June, I met my 15 performance quota, and so my base was 16 increased to \$87,500. 17 Q. So based on meeting that quota, 18 you would have earned a bonus -- 19 A. So -- 20 Q. -- prior? 21 A. Initially, I -- I didn't earn a 22 bonus -- 23 Q. Okay. 24 A. -- so by base compensation was 25 \$87 --</p>	<p style="text-align: right;">Page 24</p> <p>1 F. JIBRIL, M.D. 2 fit? And then in June 2017, your base was 3 increased to \$87,500. 4 A. Correct. 5 Q. Were there any commissions 6 associated with that? 7 A. Not at that time. 8 Q. All right, so that's your base. 9 A. Yes. 10 Q. All right. 11 What happened next in your 12 progression in compensation at Expert? 13 A. So I continued to meet my 14 performance quotas. Um, I received a 15 performance bonus of about \$10,000 that 16 year. 17 Q. In 2017? 18 A. In 2017. 19 Q. Okay. 20 A. And then in 2018, I began earning 21 commissions for my sales. 22 Q. And your base was then -- was your 23 base then still \$87,5-? 24 A. Yes, my base -- 25 Q. So --</p>
<p style="text-align: right;">Page 23</p> <p>1 F. JIBRIL, M.D. 2 Q. Okay. 3 A. -500. 4 THE REPORTER: Wait, wait, wait. 5 Can you repeat your base? 6 A. My base, when I first joined the 7 business development team was \$70,000. It 8 was increased June of 2017 to \$87,500. 9 Q. Thank you. 10 And correct me if I'm wrong. I 11 thought you said because you had met your 12 quotas, that your base was increased 13 \$87,500; is that correct? 14 A. Correct. 15 Q. And was your base at \$70- 16 accompanied by performance-based bonuses? 17 A. No, not at that time -- 18 Q. Okay. 19 A. -- because it was a trial period, 20 essentially -- 21 Q. Okay. 22 A. -- to see if the business 23 development role would be a good fit. 24 Q. All right. 25 So it sounds like it was a good</p>	<p style="text-align: right;">Page 25</p> <p>1 F. JIBRIL, M.D. 2 A. Sorry. Go ahead. 3 Q. No, no. Go ahead. 4 A. My base stayed \$87,5- until, I 5 believe, June of 2018. 6 Q. And from the beginning of 2018 7 through June of 2018, your base was \$87,5- 8 plus commissions. 9 A. Yes. 10 Q. And then what happened in June of 11 2018? 12 A. My base was increased to \$100,000. 13 Q. Also with the opportunity for 14 commissions? 15 A. With the opportunity for 16 commissions. 17 Q. Okay. 18 How long did you stay at the 19 \$100,000-plus-commissions level? 20 A. Until January of 2019. 21 Q. And was that when you were 22 promoted to VP? 23 A. Correct. 24 Q. And your base then increased to 25 \$140-?</p>

<p style="text-align: right;">Page 26</p> <p>1 F. JIBRIL, M.D. 2 A. Yes. 3 Q. Also with the opportunity for 4 commissions? 5 A. Yes. 6 Q. Would you believe might lead to 7 approximately \$200,000 in bonuses for this 8 year? 9 A. Correct. 10 Q. It's a good year. 11 A. Yeah. 12 Q. Okay. 13 So at what part in time did you 14 seek employment with Guidepoint? 15 A. Toward the end of 2017, I believe, 16 a recruiter reached out to me from 17 Guidepoint. 18 Q. Okay. 19 And who was that recruiter? 20 A. I don't recall his name. 21 Q. James? 22 A. Yes, James Lipkin [sic]. 23 Q. Lukban? 24 A. Lukban. 25 Q. L-U-K-B-A-N.</p>	<p style="text-align: right;">Page 28</p> <p>1 F. JIBRIL, M.D. 2 Q. And when did that happened? 3 A. Again, I think it was around the 4 end of 2017, beginning of 2018. 5 Q. And this was in Guidepoint's 6 offices? 7 A. Yeah. 8 Q. New York City offices? 9 A. Yes. 10 Q. And who did you meet with? 11 A. I met with Valentia Valletti; 12 Bouker Pool; James, the recruiter; and two 13 other employees of that team. 14 Q. Do you remember their names? 15 A. I don't. 16 Q. How did that interview go? 17 A. I thought it went very well. I 18 was very interested in the role. I did make 19 it clear that I didn't have financial 20 industry experience. I was told that 21 wouldn't be an issue given my other 22 experience and background. 23 Q. Well, how did the issue of 24 financial experience come up? Was it a 25 requirement? A preference? How did come</p>
<p style="text-align: right;">Page 27</p> <p>1 F. JIBRIL, M.D. 2 A. Thank you. 3 Q. So James reached out to you. You 4 understood that he was from Guidepoint? 5 A. Yes. 6 Q. And what did James have to say? 7 A. He reached out to me on LinkedIn 8 and said that there was a role for content 9 manager or content strategist that would 10 appear to be a good fit for my background. 11 I had an initial conversation with 12 him, and he then scheduled an in-person 13 meeting, interview, with several employees 14 of Guidepoint. 15 Q. Now, were you looking to change 16 employment at this point? 17 A. No, but I was open to 18 opportunities. 19 Q. Okay. 20 And you said these conversations 21 with James were the end of 2017? 22 A. I believe so. 23 Q. And you went into Guidepoint for 24 an in-person interview? 25 A. Yes.</p>	<p style="text-align: right;">Page 29</p> <p>1 F. JIBRIL, M.D. 2 up? 3 A. I was told that it was not a 4 requirement, which is why they had reached 5 out to me, but it came up because I said 6 that my only concern in the role, the only 7 thing that would limit me was the fact that 8 I did not have buy side or sell side 9 experience. 10 Q. And who in the group responded to 11 you on that issue, on the buy side/sell side 12 experience? 13 A. I believe I spoke with all the 14 interviewers about that, and they all told 15 me the same, that it wasn't an issue for 16 them. 17 Q. And what do you understand buy 18 side/sell side to be? Experience in those. 19 A. Financial terms. My understanding 20 is Guidepoint's employees -- sorry. 21 Customer, clients, are financial industry 22 analysts who are looking to due diligence, 23 potential investments, and those are terms 24 associated. 25 And my understanding was from my</p>

<p style="text-align: right;">Page 30</p> <p>1 F. JIBRIL, M.D. 2 interviews that that would be experience 3 that I would gain along the role and that it 4 wasn't essential to starting in the role. 5 Q. So your understanding was that you 6 didn't need to have that walking in the 7 door; you would sort of develop that in the 8 role. 9 A. Correct. 10 Q. Did you have talks about what the 11 compensation for this content strategist 12 position would be? 13 A. I did with James, the recruiter. 14 I told him what I was currently making and 15 what I would leave for. 16 Q. And you were currently making 17 \$87,5-? 18 A. Yes. 19 Q. And did you have those 20 conversations with James before the 21 interview? 22 A. I had it with him during the phone 23 interview, phone screening, to make sure 24 that, you know, we weren't wasting each 25 other's time and again at the end of the</p>	<p style="text-align: right;">Page 32</p> <p>1 F. JIBRIL, M.D. 2 employee of the content team. She was a 3 direct report to Valentia, and she told me a 4 little bit more about the day-to-day of her 5 role. I discussed my background with her, 6 why I was interested in the role. 7 The second employee had, um, sort 8 of a tangential role as compared to 9 Valentia. His background was less on the 10 medical health care side of things and more 11 on the products. I think he talked to me 12 about wearable technology. 13 Q. Okay. 14 If I said Ms. Yamin, Leona Yamin, 15 does that refresh your recollection as to 16 who may have met with? 17 A. Actually, I just don't recall the 18 name. 19 Q. Okay. 20 If I said the name Justin Ruiz, 21 does that refresh your recollection about 22 who you might have met with? 23 A. Potentially. I really couldn't 24 say with certainty. 25 Q. Okay. All right.</p>
<p style="text-align: right;">Page 31</p> <p>1 F. JIBRIL, M.D. 2 four interviews that I had with the hiring 3 manager and then the two employees. 4 Q. I'm sorry. You had four in-person 5 interviews? 6 A. Correct, all in quick successions. 7 Q. Okay. 8 A. Same day. 9 Q. Oh, same -- all right, so let's 10 walk through that again. 11 So it's the end of 2017, early 12 2018. You go into Guidepoint for 13 interviews? 14 A. Yes. 15 Q. With Ms. Valletti, Mr. Pool, 16 Mr. Lukban, and two others? 17 A. Two other employees, yes. 18 Q. Were they all at the same time, or 19 did you meet with them separately? 20 A. All in succession. 21 Q. Okay. 22 So can you walk us through sort of 23 the first interview? Who did you meet with 24 first? 25 A. The first interview was an</p>	<p style="text-align: right;">Page 33</p> <p>1 F. JIBRIL, M.D. 2 So your first interview as with a 3 female employee who was a direct report to 4 Ms. Valletti. 5 A. Yes. 6 Q. The second interview was with a 7 male employee, worked with content but not 8 necessarily health care. 9 A. Yes. 10 Q. And he talked to you about 11 wearable technology. 12 A. Yes. 13 Q. Okay. 14 And then who did you meet with? 15 A. Then I met with Valentia. 16 Q. So that was your third interview 17 that day. 18 A. Yes. 19 Q. How long are these interviews 20 lasting? 21 A. The first two, probably not much 22 longer than 30 minutes, 45 minutes. The 23 interview with Valentia was about just over 24 an hour, I think. 25 Q. Okay.</p>

<p style="text-align: right;">Page 34</p> <p>1 F. JIBRIL, M.D. 2 And what did you and Valentia talk 3 about? 4 A. Talked about the role. We talked 5 about why they were potentially interested 6 in me specifically. She talked about her 7 vision for the team. 8 I have to note that the two 9 interviews before her spoke very highly of 10 her and how she was very enthusiastic and 11 bringing a lot of expertise to the role, so 12 it -- it was a productive conversation. 13 Q. And just curious: How would that 14 have come up, you know, if the interviewers 15 were asking you questions about your 16 background, that they would have talked 17 about the third person you were going to 18 interview that day? 19 A. I asked. I asked about the team 20 dynamics. 21 Q. Okay. 22 A. I definitely wanted to find out 23 about -- about the company itself, what it 24 would be like to work there, so I asked just 25 as many questions as they asked me.</p>	<p style="text-align: right;">Page 36</p> <p>1 F. JIBRIL, M.D. 2 interviewed with Bouker next? 3 A. Yes. 4 Q. So that's your fourth interview? 5 A. Yes. 6 Q. I'm sorry. 7 And then if you could tell us 8 where you were going to go then. You 9 addressed that with Bouker? 10 A. Yes, so at the end of my interview 11 with Bouker, he certainly that said that, 12 you know, hiring decision was Valentina's. 13 I asked about next steps, if there 14 was anyone else that I would be interviewing 15 with. And he said, "No, the only person 16 more senior than me would be the CEO, 17 Albert," and that he wouldn't be part of the 18 decision. 19 Q. Okay. 20 So your battery of interviews 21 ended. What were your next steps in your 22 candidacy with Guidepoint? 23 A. Just to be complete, I did have 24 one last touch point with James -- 25 Q. Sure.</p>
<p style="text-align: right;">Page 35</p> <p>1 F. JIBRIL, M.D. 2 Q. Okay. 3 So you were asking about the team 4 and the personnel on the team. 5 A. Yes. 6 Q. Okay. 7 Would this have been a position 8 where you would have reported to 9 Ms. Valletti? 10 A. Correct. 11 Q. And did she make that clear to you 12 in this interview? 13 A. Yes. 14 Q. What, if anything, did 15 Ms. Valletti share with you during the 16 interview about her hiring authority? 17 A. She let me know that she was the 18 hiring manager, that Bouker was also part of 19 the decision making process, but that he was 20 deferring to her to make a decision. 21 I also just addressed that with 22 Bouker in my interview with him. I asked 23 him about -- 24 Q. And I'm sorry. That would have 25 been your fourth? You would have</p>	<p style="text-align: right;">Page 37</p> <p>1 F. JIBRIL, M.D. 2 A. -- the recruiter where we 3 discussed salary, and he made it clear that, 4 um, the next step would be someone from 5 HR -- he made it clear that the next step 6 would be HR reaching out about an offer. 7 Q. And when you had a conversation 8 with James about salary what amounts or 9 ranges were you talking about? 10 A. We were talking about \$140- to 11 \$160-. 12 Q. And that would be base? 13 A. Yes. 14 Q. All right. 15 Did they take about any bonuses 16 associated with that? 17 A. No, but I did know that Valentia 18 earned bonuses. 19 Q. And how did you learn that? 20 A. Through my interview. 21 Q. With her? 22 A. Yes. 23 Q. Was it your understanding that you 24 also would be earning bonuses, or there was 25 at least that potential?</p>

<p style="text-align: right;">Page 38</p> <p>1 F. JIBRIL, M.D. 2 A. My inference was that there was a 3 potential. 4 Q. Had you met Ms. Valletti before 5 this? 6 A. No, the interview was my first 7 time meeting her. 8 Q. All right. 9 So you had conversations with 10 James where he told you the salary range for 11 the position would be \$140- to \$160-? 12 A. Well, he asked me what my salary 13 expectations -- 14 Q. Oh, okay. 15 And you said \$140- to \$160-. 16 A. And he said that that was -- yes, 17 and he said that would be within the range. 18 Q. Okay. 19 Was there any other follow-up had 20 with James -- 21 A. Yes. 22 Q. -- about the position? 23 What was that follow-up? 24 A. I sent thank you emails to the 25 interviewers. He asked me for writing</p>	<p style="text-align: right;">Page 40</p> <p>1 F. JIBRIL, M.D. 2 A. Radio silence for a few weeks. I 3 did send him a follow-up email, asked if 4 there was any additional information that he 5 needed from me. I didn't hear back until 6 February. 7 Q. Of 2018. 8 A. Yes. 9 Q. So James responds to you in 10 February of 2018? 11 A. Yes. 12 Q. And what does James say? 13 A. He asked me for my availability 14 for a call. We scheduled a phone call, and 15 he lets me know that I would not be offered 16 the position. He said that Bouker and 17 Valentia, to quote him directly, went to bat 18 for me but that Albert, the CEO, vetoed me 19 being employed. 20 Q. Had you met Albert? 21 A. No. 22 Q. Had you ever spoken to Albert? 23 A. No. 24 Q. Did James tell you why Albert 25 vetoed extending an offer to you?</p>
<p style="text-align: right;">Page 39</p> <p>1 F. JIBRIL, M.D. 2 samples, which I provided him. 3 Q. References? 4 A. And references. 5 My references were interviewed. 6 Q. How many references? 7 A. Two. 8 Q. And when you say they were 9 interviewed, what do you mean? 10 A. They spoke with James. 11 Q. James reached out to your 12 references? 13 A. Yes. 14 (Whereupon, a discussion was held 15 off the record at this time.) 16 Q. After you provided your references 17 to James and he -- you understood he spoke 18 with your references, what was the next step 19 in your candidacy with Guidepoint? 20 A. My expectation was that I would 21 hear back with an offer. 22 Q. And did that in fact happen? 23 A. No. 24 Q. What did you hear from Guidepoint 25 after providing James your references?</p>	<p style="text-align: right;">Page 41</p> <p>1 F. JIBRIL, M.D. 2 A. I don't believe he did. 3 Q. Did you have any conversations 4 with James after that? 5 A. No, but during that same 6 conversation, he mentioned that there might 7 be some other roles at the company that 8 might be a good fit for me, and he also 9 mentioned that he knew a recruiter at 10 another company that might be interested in 11 hiring me. 12 Q. So there were other roles at 13 Guidepoint that James had in mind for you? 14 A. Yes. 15 Q. And I guess he had a colleague 16 doing the same sort of work in another 17 company that he was going to refer you to? 18 A. Yes. 19 Q. Did he refer you to another 20 recruiter? 21 A. No. 22 Q. Did he have any follow-up with you 23 about other potential roles at Guidepoint? 24 A. No. 25 Q. How many times have you applied</p>

Page 42	Page 44
<p>1 F. JIBRIL, M.D. 2 for employment with Guidepoint? 3 A. I think -- I didn't apply for this 4 role. Um, I applied for a role I think back 5 in 2014. 6 Q. So that was in the application to 7 Guidepoint in 2014? 8 A. Yes. 9 Q. And what role was that for? 10 A. Research analyst. 11 Q. And what happened with that 12 application? 13 A. I don't believe I heard back. 14 Q. And then you were in the process 15 of -- or applying to become the content 16 strategist in the end of 2017, early 2018? 17 A. Yes. 18 Q. So that's the second application 19 to Guidepoint? 20 A. Yes, call it that. 21 Q. Have you had any other 22 applications for employment with Guidepoint? 23 A. I think late in 2018 -- it might 24 have been early 2019 -- another recruiter 25 reached out to me from Guidepoint about a</p>	<p>1 F. JIBRIL, M.D. 2 A. Yes. 3 Q. And what happened with that role? 4 A. So I actually had a phone 5 interview with him and -- 6 Q. I'm sorry. With whom, the 7 third-party recruiter? 8 A. With the third-party recruiter. 9 Q. And who was that? 10 A. I can't recall his name. 11 Q. Do you recall who he worked for? 12 A. No. 13 Q. About when would you have had this 14 phone interview with a third-party 15 recruiter? 16 A. It was in May of this year, I 17 believe. 18 Q. May of 2019? 19 A. Yes. 20 Q. Okay. 21 And what did you talk about during 22 that interview? 23 A. We talked in very general terms 24 about the role, what it involved. And then 25 when we got pretty specific about, you know,</p>
Page 43	Page 45
<p>1 F. JIBRIL, M.D. 2 role on the business development team, and 3 then -- and -- and she was an employee of 4 Guidepoint. 5 And then later that same year, a 6 third-party recruiter reached out to me. He 7 didn't make mention of the company 8 initially, um, but I believe it was the same 9 role, reached out to me about it. 10 Q. Okay. 11 So who from Guidepoint reached out 12 to you late 2018, early 2019? 13 A. Off the top of my head, I couldn't 14 tell you. 15 Q. Jenna? 16 A. That sounds familiar. 17 Q. And Jenna let you know that 18 Guidepoint was looking to place someone in a 19 business development role? 20 A. Yes. 21 Q. And then around the same time, you 22 heard from a third-party recruiter? 23 A. Yes. 24 Q. With information that led you to 25 believe that it was for the same role?</p>	<p>1 F. JIBRIL, M.D. 2 who it was for, he said that Guidepoint was 3 the employer, and I told him that, "I've 4 already had this conversation with someone." 5 Q. Okay. 6 So you were able to confirm with 7 the third-party recruiter that he was 8 seeking employees for Guidepoint. 9 A. Yes. 10 Q. And you told him that you had 11 already spoken with who we believe to be 12 Jenna -- 13 A. Yes. 14 Q. -- at Guidepoint? 15 A. Uh-huh. 16 Q. Okay. 17 And what did the recruiter have to 18 say in response to that? 19 A. He said, "If someone at Guidepoint 20 has already reached out to you, than the 21 conversation a moot." 22 Q. Okay. 23 Did you have any other further 24 conversations -- well, strike that. 25 Did you have any other further</p>

<p style="text-align: right;">Page 46</p> <p>1 F. JIBRIL, M.D. 2 conversations with that third-party 3 recruiter about this position? 4 A. No. 5 Q. Did you have any further 6 conversations with Guidepoint about this 7 position? 8 A. No. 9 Q. So the last communication you 10 would have had about this business 11 development team would have been with the 12 third-party recruiter? 13 A. Yes. 14 Q. You never spoke with Jenna again? 15 A. No, I gave her my availability for 16 a phone interview and then did not hear 17 back. 18 Q. Had Jenna asked for your 19 availability for a phone interview? 20 A. Yes, I believe we may have 21 scheduled one, and she missed it. 22 Q. And when was that supposed to have 23 occurred? 24 A. I can't recall off the top of my 25 head. It was before I heard from the</p>	<p style="text-align: right;">Page 48</p> <p>1 F. JIBRIL, M.D. 2 a fourth? 3 A. No. 4 Q. When you were talking with the 5 third-party recruiter and Guidepoint about 6 the business development team, were you 7 looking to leave Expert? 8 A. I'm always open to hearing about 9 other opportunities. 10 Q. Did you have occasion to talk to 11 either Guidepoint or the third-party 12 recruiter about the compensation for the 13 business development team role? 14 A. No. 15 Q. Okay. 16 If we could just go back to your 17 talks with James about the vetoing of the 18 offer to you. Did you have talks with James 19 about any other roles at Guidepoint? 20 A. No, he alluded to other roles that 21 might be a good fit, but that was the final 22 time I spoke with him. There was no 23 follow-up. 24 Q. Final time you spoke with James at 25 all?</p>
<p style="text-align: right;">Page 47</p> <p>1 F. JIBRIL, M.D. 2 third-party recruiter. 3 Q. Would we still be in May of 2019? 4 April of -- 5 A. I think it was much earlier than 6 that. 7 Q. Okay. 8 So you were scheduled to speak 9 with the Guidepoint recruiter before you 10 ultimately spoke with the third-party 11 recruiter. 12 A. Yes. 13 Q. After you spoke with the 14 third-party recruiter, did you follow up 15 with Guidepoint and give your availability 16 for a phone interview again? 17 A. No. 18 Q. Was your communication with the 19 third-party recruiter sort of the end of the 20 process for that position? 21 A. Yes. 22 Q. All right. 23 So if that's your third -- I don't 24 know about application, but third 25 interaction with Guidepoint, has there been</p>	<p style="text-align: right;">Page 49</p> <p>1 F. JIBRIL, M.D. 2 A. Yes. 3 Q. After James told you that an offer 4 would not be extended, did you speak to 5 anyone else at Guidepoint about the content 6 strategist position? 7 A. A few months later, I did -- 8 Valentia reached out to me. She was no 9 longer at Guidepoint. 10 Q. So this would be a few months 11 after February 2018? 12 A. Yes, I believe it was around June. 13 Q. June of 2018, Valentia reaches out 14 to you? 15 A. I believe so. 16 Q. How so? 17 A. She messaged me on LinkedIn. 18 Q. Had you ever directly communicated 19 with Valentia before? 20 A. No, other than my interview, 21 post-interview email. 22 Q. You sent her a thank you email. 23 A. Yes. 24 Q. Had you had any communications 25 since that until your June 28 [sic]</p>

<p style="text-align: right;">Page 50</p> <p>1 F. JIBRIL, M.D. 2 LinkedIn -- 3 A. No. 4 Q. June 2018 LinkedIn connection. 5 Okay. 6 What did Valentia tell you in the 7 June 2018 connection? 8 A. She said she had been meaning to 9 reach out to me and asked for my 10 availability for a call. 11 Q. And you knew at that time she 12 wasn't with Guidepoint? 13 A. I only knew because I looked at 14 her LinkedIn profile and saw she had left. 15 Q. Did Valentia give you a reason why 16 she wanted to speak with you? 17 A. Not at that time. 18 Q. Did you eventually set a time to 19 speak with her? 20 A. Yes. 21 Q. Okay. 22 And what was that? 23 A. So she told me that she had been 24 fired from Guidepoint, she and Bouker Pool 25 shortly after my interview. She sided</p>	<p style="text-align: right;">Page 52</p> <p>1 F. JIBRIL, M.D. 2 office. 3 Q. Okay. 4 Anything in your application for 5 research analyst that would have led you to 6 believe that the decision was gender-based? 7 A. Well, I never heard back about 8 that application. 9 Q. Anything in the conversations 10 about the business development team role 11 that would lead you to believe that it was 12 gender-based? 13 A. No. 14 Q. Okay. 15 So Valentia told you that she was 16 let go from Guidepoint. She had made a 17 complaint. She cited again gender-based 18 discrimination problems. 19 What else did Valentia have to 20 say? 21 A. I think at that time she told me 22 that she was taking legal action in the form 23 of an EEOC filing. 24 Q. And on what basis did she say she 25 was filing with the EEOC?</p>
<p style="text-align: right;">Page 51</p> <p>1 F. JIBRIL, M.D. 2 that -- she told me that she had written a 3 formal complaint about gender discrimination 4 at the company and cited my lack of hiring 5 as an example of it. 6 Q. And how did you have this 7 conversation with Valentia? 8 A. Over the phone. 9 Q. And when did this phone 10 conversation occur? 11 A. About a week after she reached out 12 to me. 13 Q. So we might still be in June of 14 2018? 15 A. Possibly. 16 Q. What else did Valentia have to say 17 about Guidepoint in that call? 18 A. Um, she told me that there were a 19 lot of problems at Guidepoint, um, with 20 gender-based discrimination. 21 Q. Had you experienced anything 22 related to gender-based discrimination in 23 your dealings with Guidepoint? 24 A. I had very limited interaction. 25 It was that one day that I was at the</p>	<p style="text-align: right;">Page 53</p> <p>1 F. JIBRIL, M.D. 2 A. Gender discrimination. 3 Q. Prior to speaking with Valentia, 4 did you ever consider filing a charge 5 yourself? 6 A. I -- I -- I didn't consider filing 7 a charge, but I did consider reaching out to 8 the hiring managers or HR for more 9 description or a better explanation as to 10 why I was not hired. 11 Q. You would have sought an 12 explanation as to why Albert vetoed the 13 extension of the offer? 14 A. Yes. 15 Q. Did you ultimately do that, reach 16 out to HR? 17 A. No. 18 Q. Or the hiring managers? 19 A. No. 20 Q. All right. 21 So Valentia tells you she's 22 considering legal action, likely an EEOC 23 filing, and what's the next thing you guys 24 talk about? 25 A. She tells me that I'm mentioned in</p>

<p style="text-align: right;">Page 54</p> <p>1 F. JIBRIL, M.D. 2 her complaint and that she believed that the 3 decision not to hire me was directly because 4 of my gender. 5 She, I believe, had already spoken 6 with an employment discrimination attorney 7 at that time, and we met and decided to 8 retain an attorney together. 9 Q. All right. 10 So after you spoke with Valentia 11 over the phone in June, you then had an 12 in-person meeting with her? 13 A. Yes. 14 Q. And when did that occur? 15 A. Around September of the same year. 16 Q. Between June and September of 17 2018, had you had communications with 18 Valentia? 19 A. Yes. 20 Q. Okay. 21 And what were the nature of those 22 communications? 23 A. Discussing the case against 24 Guidepoint. 25 Q. Prior to speaking with Valentia in</p>	<p style="text-align: right;">Page 56</p> <p>1 F. JIBRIL, M.D. 2 position. I asked very specifically about 3 the structure of the team, how many people 4 were being hired, why the position was open. 5 Q. And who did you ask those 6 questions of? 7 A. Valentia and Bouker. 8 Q. And Valentia and Bouker told you 9 that it was one position? 10 A. Yes. 11 Q. So it would be a surprise to you 12 if I told you they hired 15 people for that 13 position. 14 A. I did know that before today. 15 Q. So better question: Was it a 16 surprise when you learned that 15 people 17 were hired for that position? 18 A. Not necessarily. I think that 19 with Bouker and Valentia no longer at the 20 firm, surely there was some restructuring 21 and reorganizing. 22 Q. I know you're not with Guidepoint, 23 but do you have any idea of the gender 24 makeup to the 15 content strategists that 25 were ultimately hired?</p>
<p style="text-align: right;">Page 55</p> <p>1 F. JIBRIL, M.D. 2 June of 2018, did you have any reason to 3 believe that the vetoing of the extension of 4 the offer to you was gender-based? 5 A. I had a feeling. My references 6 were interviewed. And my understanding, 7 that is a final step. Bouker and Valentia 8 as good as told me that I was hired during 9 the interview process as did James. My 10 references told me that the conversation 11 that they had with James was very positive. 12 And I -- I wouldn't believe that they would 13 speak to my references if there wasn't a 14 real consideration of me as a candidate. 15 When James told me that I was not 16 hired, he made it very clear that it was a 17 decision by Albert, not the hiring managers. 18 Q. Did your references say that James 19 spoke to them about the buy side/sell side 20 issue? 21 A. No. 22 Q. Do you know how many content 23 strategist positions Guidepoint was looking 24 to fill when it was interviewing you? 25 A. I was told that there was one open</p>	<p style="text-align: right;">Page 57</p> <p>1 F. JIBRIL, M.D. 2 A. No. 3 Q. Do you think they're all men? 4 A. I don't know. 5 Q. Did you ultimately file a charge 6 with the EEOC? 7 A. I did. 8 Q. And what was the basis of that 9 charge? 10 A. Failure to hire based on gender. 11 Q. And what was the determination at 12 the EEOC? 13 A. (No verbal response given.) 14 Q. Strike that. 15 What happened with the filing of 16 your EEOC charge? 17 A. I believe that they chose not to 18 take action. 19 Q. And what did you next do in terms 20 of pursuing your legal rights against 21 Guidepoint after you learned the EEOC was 22 not going to take further action? 23 A. I retained an attorney, 24 Mr. Lichten. 25 Q. And a complaint was filed, and</p>

<p style="text-align: right;">Page 58</p> <p>1 F. JIBRIL, M.D. 2 we're here today. 3 A. Yes. 4 Q. Okay. 5 Did you speak with Bouker after 6 you learned that the offer was not going to 7 be extended? 8 A. No. 9 Q. Other than James and Valentia, did 10 you speak to anyone else at Guidepoint after 11 you learned that the officer was not going 12 to be extended? 13 A. No, other than the recruiter that 14 reached out to me. 15 Q. Sorry, right. 16 A. Yes. 17 Q. About the content strategist 18 position. 19 A. No, I did not speak with anyone 20 else. 21 Q. But we talked about your 22 application for the business development 23 team. 24 A. Yes. 25 Q. Which occurred later.</p>	<p style="text-align: right;">Page 60</p> <p>1 F. JIBRIL, M.D. 2 Q. And do you recognize 3 Defendant's F? 4 A. Yes. 5 Q. And what is it? 6 A. Guidepoint Global, LLC. 7 Q. Defendant's F is? 8 A. You're asking for the defendants 9 on Exhibit F? 10 Q. No, I'm sorry. I'm sorry. 11 The document that's been marked as 12 Defendant's Exhibit F, what is that 13 document? 14 A. That is the EEOC filing, Charge of 15 Discrimination. 16 Q. And you recognize that as a Charge 17 of Discrimination? 18 A. Yes. 19 Q. Is that your Charge of 20 Discrimination? 21 A. Yes. 22 Q. The charge alleges discrimination 23 based on sex; is that correct? 24 A. Yes. 25 Q. And the particulars given in the</p>
<p style="text-align: right;">Page 59</p> <p>1 F. JIBRIL, M.D. 2 A. Yes. 3 MR. GRECH: Okay. 4 Let me just take a five-minute 5 break. I got to get a document. 6 (Whereupon, a recess was taken at 7 this time.) 8 (Whereupon, three black-and-white 9 documents were marked as Defendant's 10 Exhibits E, F, AND G for identification 11 as of this date.) 12 Q. Dr. Jibril, showing you what's 13 been marked for today's purposes as 14 Defendant's Exhibit E (handing). 15 A. (Perusing.) 16 Q. And I'm also going to show you 17 what's been marked as Defendant's F 18 (handing). 19 A. (Perusing.) 20 Q. I'm sorry. If we could start with 21 F first. If you could just take a moment to 22 look at Exhibit F and let me know when 23 you've had that opportunity. 24 A. (Perusing.) 25 Okay, yep.</p>	<p style="text-align: right;">Page 61</p> <p>1 F. JIBRIL, M.D. 2 charge are -- I'll just read it: 3 "In December 2017, a recruiter 4 from Guidepoint Global, LLC contacted me 5 regarding the position of health care 6 content strategist. 7 "After several days of interviews 8 and discussions, the company's hiring 9 managers for the position told me that they 10 wanted to hire me. 11 "Chief Executive officer, Albert 12 Sebag, without ever meeting me, vetoed my 13 appointment. The company informed me of its 14 decision on February 1, 2018. A male was 15 ultimately hired for the position. 16 "I believe the company did not 17 offer me the position because of my sex." 18 First, is that an accurate reading 19 of the charge? 20 A. Yes. 21 Q. And you swore to that charge. 22 A. Yes. 23 Q. And this charge was filed July 9th 24 of 2018; is that correct? 25 A. Yes.</p>

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1 F. JIBRIL, M.D.
2 Q. Why did you wait from February 1st
3 to July 9th to file a charge with the EEOC?
4 A. I was not sure, 100 percent
5 certain, that I was not offered the position
6 because of my sex. It was not until the
7 hiring manager, Valentia, reached out to me
8 in June to tell me that was the case.
9 Q. Okay.
10 And just going through the
11 particulars of your charge here, the
12 recruiter referenced in there, that's James?
13 A. Yes.
14 Q. The company's hiring managers,
15 those would have been Valentia and Bouker?
16 A. Yes.
17 Q. The allegation there that, "CEO,
18 Albert Sebag, without even meeting me,
19 vetoed my appointment," you learned that
20 from James?
21 A. Yes.
22 Q. The company informed you of its
23 decision on February 1, 2018. That would
24 have been through James?
25 A. Yes.

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1 F. JIBRIL, M.D.
2 Q. The next allegation is that a male
3 was ultimately hired for the position; is
4 that correct?
5 A. That was to my -- to my knowledge
6 at the time, yes.
7 Q. And who gave you that knowledge?
8 A. Valentia.
9 Q. When did she give you that
10 knowledge?
11 A. When I spoke with her in June.
12 Q. When did you learn that they
13 ultimately hired 15 people?
14 A. When that was included in one of
15 the documents as part of this proceeding.
16 Q. In the litigation.
17 A. Yes.
18 Q. And the final allegation is you
19 believe the company did not offer you the
20 position because of your sex.
21 A. Yes.
22 Q. Did you change that belief when
23 you learned that they hired 15 people?
24 A. No.
25 Q. Why not?

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1 F. JIBRIL, M.D.
2 A. Because at the time I was
3 interviewing for a position that was open to
4 one person.
5 Q. And if you had thought that you
6 were -- offer was voted because of your
7 gender, why would you have even entertained
8 the thought of the business development team
9 position?
10 A. Again, I had a preliminary
11 conversation with the recruiter. She did
12 not follow up with me. Not sure why. But
13 I'm always open to listening to other
14 opportunities.
15 Q. If a recruiter from Guidepoint
16 called you today, would you entertain that
17 offer?
18 A. I would speak with the recruiter,
19 yes. I speak with multiple recruiters from
20 multiple companies pretty regularly.
21 Q. Are you looking to leave Expert?
22 A. Not actively, no.
23 Q. So the same position, you'll
24 listen to opportunities?
25 A. Yes.

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1 F. JIBRIL, M.D.
2 Q. And I believe you had said earlier
3 that you retained counsel after you learned
4 the decision from the EEOC?
5 A. No. Before.
6 Q. Okay.
7 And Ms. Valletti has the same
8 counsel?
9 A. Yes.
10 Q. At the time you spoke to
11 Ms. Valletti in June of 2018, did she
12 indicated that she had already retained
13 counsel?
14 A. I believe so. I believe that she
15 had already retained counsel to file the
16 EEOC complaint.
17 Q. And we spoke earlier about
18 swearing to the charge. At the bottom
19 left-hand corner, where it says charging
20 party's signature, doctor, is that your
21 signature?
22 A. Yes.
23 Q. And the language used in the
24 particulars section, who drafted that
25 language?

<p style="text-align: right;">Page 66</p> <p>1 F. JIBRIL, M.D. 2 A. Myself and my attorney, 3 Mr. Lichten. 4 Q. So you filed this charge, and 5 ultimately you heard from the EEOC that it 6 wasn't going to pursue it any further. 7 A. Yes. 8 Q. All right. 9 So if we could now look at 10 Defendant's E. 11 A. (Perusing.) 12 Q. And Dr. Jibril, if you could just 13 take a moment to review that and let us know 14 if you're familiar with it. 15 A. (Perusing.) 16 Yes, I'm familiar with this 17 document. 18 Q. All right. 19 So Dr. Jibril, you're familiar 20 with Defendant's Exhibit E? 21 A. Yes. 22 Q. And what do you recognize that to 23 be? 24 A. This is the Complaint filed by 25 myself and Ms. Valletti against Guidepoint</p>	<p style="text-align: right;">Page 68</p> <p>1 F. JIBRIL, M.D. 2 A. Yes. 3 Q. What others were actively 4 recruiting you at that time? 5 A. Um, there was a law firm that 6 was -- had reached out to me. 7 Q. Which firm was that? 8 A. I don't recall the name. 9 Q. Reached out to you to fill what 10 role? 11 A. It was a business development 12 role. 13 Q. And where was the firm located? 14 A. In New Jersey. 15 Q. And did you pursue that 16 recruitment? 17 A. I had initial conversations but no 18 in-person interview. 19 Q. Who did you have initial 20 conversations with? 21 A. The recruiter. 22 Q. And who was the recruiter? 23 A. Anna Kogut. 24 Q. And who does -- who did Ms. Kogut 25 work for?</p>
<p style="text-align: right;">Page 67</p> <p>1 F. JIBRIL, M.D. 2 Global. 3 Q. And in Paragraph 1, the allegation 4 is that you've brought this action to remedy 5 discrimination on the basis of sex; is that 6 correct? 7 A. Yes. 8 Q. If, Dr. Jibril, we could refer to 9 Paragraph 8, it's Page 2. 10 A. (Perusing.) 11 Q. There, the allegation is in 12 December 2017, Guidepoint actively recruited 13 Jibril for the position of health care 14 content strategist. Do you see that 15 allegation? 16 A. Yes. 17 Q. Do you agree with that allegation? 18 A. Yes. 19 Q. And this was the recruitment for 20 the health care content position that we 21 were talking about before? 22 A. Yes. 23 Q. Were you actively being recruited 24 by others at -- during that time in 25 December 2017?</p>	<p style="text-align: right;">Page 69</p> <p>1 F. JIBRIL, M.D. 2 A. I don't remember the name of the 3 law firm. 4 Q. But she was the recruiter for the 5 firm? 6 A. Yeah, she worked in the HR 7 department. 8 Q. And you had initial conversations 9 with Ms. Kogut about the position at the 10 firm. 11 A. Yes. 12 Q. Okay. 13 And when did you have those 14 initial conversations? 15 A. Probably before James had reached 16 out to me. 17 Q. And what did you talk about with 18 Ms. Kogut? 19 A. She told me about the opening to 20 see if it would be a good fit for me. I was 21 not interested at the time. 22 Q. But you were still willing to 23 listen to opportunities? 24 A. Yes. 25 Q. And what made you determine that</p>

<p style="text-align: right;">Page 70</p> <p>1 F. JIBRIL, M.D. 2 it was not a good fit? 3 A. The job was located in New Jersey, 4 and I did not want to commute. 5 Q. So did it proceed beyond any of 6 the initial conversations with Ms. Kogut? 7 A. No. 8 Q. And you gave her the sense that it 9 was not going to be something you would 10 pursue? 11 A. Yes. 12 Q. Was any other entity actively 13 recruiting you in or around December of 14 2017? 15 A. Not in December. 16 Q. When, then? 17 A. Throughout the year. 18 Q. Throughout 2017? 19 A. Throughout 2017. 20 Q. Okay. 21 So other than this law firm and 22 Guidepoint, who else was recruiting you in 23 2017? 24 A. I heard from various employers. 25 Q. And obviously you didn't take</p>	<p style="text-align: right;">Page 72</p> <p>1 F. JIBRIL, M.D. 2 Q. Was there anything that was shared 3 with you in the phone screening with the 4 other four recruiters that gave you the 5 sense that those employers would have been 6 making decisions on a gender basis? 7 A. No. 8 Q. So those processes didn't proceed 9 past the phone screening with the recruiter. 10 A. Correct. 11 Q. And what areas were these 12 positions? 13 A. One that I recall specifically was 14 a language translation service. 15 Q. And in what position? 16 A. Business development. 17 Q. Okay. 18 I believe you had said four. Do 19 you recall any of the other three? 20 A. No, not specifically. 21 Q. Would these have all been in 22 business development positions? 23 A. Mostly, yes. 24 Q. Did you have conversations with 25 any of these four recruiters about</p>
<p style="text-align: right;">Page 71</p> <p>1 F. JIBRIL, M.D. 2 those positions, but how far along -- what 3 was the furthest you have gotten along in 4 those processes? 5 A. The furthest was with Guidepoint. 6 Q. Had you had interviews with other 7 entities regarding a new position? 8 A. Phone screenings. No in-person 9 interviews. 10 Q. And who did you have phone 11 screenings with? 12 A. Recruiters. 13 Q. Which recruiters? 14 A. I couldn't tell you their names. 15 Q. Other than Guidepoint and the law 16 firm, how many phone screenings with 17 recruiters did you have in 2017? 18 A. I would say about four. 19 Q. And there was nothing in the talks 20 with Ms. Kogut that led you to believe the 21 position was not going to be offered because 22 of a gender reason, right? 23 A. No. 24 Q. It was commuting. 25 A. Yes.</p>	<p style="text-align: right;">Page 73</p> <p>1 F. JIBRIL, M.D. 2 compensation levels? 3 A. No. 4 Q. Did you have conversations with 5 Ms. Kogut about a compensation level? 6 A. No. 7 Q. Dr. Jibril, could you turn to 8 Allegation 13? It's on Page 3. 9 A. (Perusing.) 10 Q. Paragraph 13 reads: 11 "In December 2017, lateral 12 recruiter, James Lukban, contacted Jibril to 13 see if she would be interested in the 14 position of health care content strategist. 15 "On January 22nd" -- it says 1018, 16 but I assume it's 2018 -- "after several 17 days of interviews and discussions, Lukban 18 informed Jibril that," quote, "as a final 19 step in the process, Guidepoint wished to 20 conduct a reference check. Later that day, 21 Jibril provided the requested references." 22 Do you see that, Dr. Jibril? 23 A. Yes. 24 Q. And that allegation is true? 25 A. Yes.</p>

<p style="text-align: right;">Page 74</p> <p>1 F. JIBRIL, M.D. 2 Q. The allegation here about several 3 days of interviews, did you go to Guidepoint 4 on more than one day for interviews? 5 MR. LICHTEN: I object. 6 It doesn't say several days of 7 interviews. 8 It's several days of interviews 9 and discussions. 10 MR. GRECH: Fair. 11 Q. You see where it says, "several 12 days of interview and discussions"? 13 A. Yes. 14 Q. Did you have several days of 15 interviews with Guidepoint or one? 16 A. I had one initial conversation 17 with a recruiter, so that would be one day. 18 I had a subsequent conversation with the HR 19 department to schedule an in-person meeting. 20 On January 22nd, I attended four in-person 21 interviews. And I had subsequent 22 discussions with James Lukban regarding my 23 references and additional information that 24 he asked for. 25 Q. Fair enough.</p>	<p style="text-align: right;">Page 76</p> <p>1 F. JIBRIL, M.D. 2 account management. His name is Dave Glynn, 3 G-L-Y-N-N. 4 Q. Is and Mr. Glynn worked at Expert 5 at that time? 6 A. At Expert Institute? Yes. 7 Q. And you're okay with giving an 8 Expert employee as a reference in your job 9 search to leave Expert? 10 A. It was requested, and I was 11 confidant at the time that I was being 12 offered the position. 13 Q. And you spoke with Lisa about her 14 talks with James? 15 A. Yes. 16 Q. And you spoke with Dave about his 17 talks with James. 18 A. Yes. 19 Q. Do you still work with Dave? 20 A. I do. 21 Q. Do you still work with Lisa? 22 A. Yes. 23 Q. When you spoke with Lisa about her 24 talks with James, did Lisa give you any 25 reason to reconsider your application to</p>
<p style="text-align: right;">Page 75</p> <p>1 F. JIBRIL, M.D. 2 So you visited Guidepoint one 3 time. 4 A. Yes. 5 Q. Okay. 6 And it says here that, "Later that 7 day, Jibril provided the requested 8 references." Those are references we 9 discussed earlier? 10 A. Yes. 11 Q. And it's your understanding that 12 James reached out to those references? 13 A. Yes. 14 Q. And you spoke with those 15 references thereafter? 16 A. Yes. 17 Q. Who were those references? 18 A. I was requested to provide a 19 current client. Her name was Lisa Van 20 Essendelft. 21 I'll spell that: 22 E-S-S-E-N-D-E-L-F-T. 23 And the other reference requested 24 was the direct supervisor. I gave our vice 25 president of business development and</p>	<p style="text-align: right;">Page 77</p> <p>1 F. JIBRIL, M.D. 2 Guidepoint? 3 A. No. 4 Q. Did Lisa give you any reason to 5 consider that perhaps as a woman you 6 shouldn't be applying to Guidepoint? 7 A. No. 8 Q. When you spoke with Dave, did he 9 give you any reason to reconsider your 10 application at Guidepoint? 11 A. Only that he did not want me to 12 leave The Expert Institute. 13 Q. Sure. 14 Did he give you any reason to 15 believe that as a woman you should not be 16 applying to Guidepoint? 17 A. No. 18 Q. Allegation 14: "Guidepoint 19 designated Valletti and her supervisor, 20 director of content strategist, Bouker Pool, 21 as the company's hiring managers for the 22 position of health care content strategist, 23 which meant that Valletti and Pool possessed 24 full and final authorization to hire a 25 candidate for the position. Valletti and</p>

<p style="text-align: right;">Page 78</p> <p>1 F. JIBRIL, M.D. 2 Pool decided to hire Jibril." 3 Do you see that allegation, 4 doctor? 5 A. Yes. 6 Q. And do you agree with that 7 allegation? 8 A. Yes. 9 Q. And you understood Pool to be 10 Valletti's supervisor. 11 A. Yes. 12 Q. Buy your testimony earlier was 13 that Valletti was the ultimate authority on 14 your hire? 15 A. Yes. 16 Q. And that Bouker would defer to 17 her. 18 A. Yes. 19 Q. And Valletti and Bouker told you 20 that. 21 A. Yes. 22 Q. It says here that Valletti and 23 Pool decided to hire you. 24 A. Yes. 25 Q. Is that correct?</p>	<p style="text-align: right;">Page 80</p> <p>1 F. JIBRIL, M.D. 2 is Paragraph 15. 3 A. (Perusing.) 4 Q. "Guidepoint chief executive 5 officer, Albert Sebag, without ever meeting 6 Jibril, voted her hire. Guidepoint 7 ultimately hired a man for that position." 8 Do you see that allegation, doctor? 9 A. Yes. 10 Q. And do you agree with that 11 allegation? 12 A. Yes. 13 Q. And it was James that told you 14 that Albert had vetoed your hire? 15 A. Yes. 16 Q. And you had never met Albert. 17 A. Yes. 18 Q. And to this day, you've never met 19 Albert. 20 A. Yes. 21 Q. Have you ever spoken with Albert? 22 A. No. 23 Q. Any communications with Mr. Sebag 24 at all? 25 A. No.</p>
<p style="text-align: right;">Page 79</p> <p>1 F. JIBRIL, M.D. 2 Um, how did they communicate to 3 you that they had made the decision to hire 4 you? 5 A. They let me know at the end of my 6 interview that the HR department would be 7 reaching out to me for final steps. 8 Q. Well, if there were final steps to 9 take, was it your understanding that you had 10 been hired? 11 A. My understanding was pending a 12 reference check, than an offer would be 13 extended. 14 Q. And Lisa said she spoke with James 15 at Guidepoint? 16 A. Yes. 17 Q. Did Lisa say she spoke with anyone 18 else at Guidepoint? 19 A. No. 20 Q. And Dave spoke with James. 21 A. Yes. 22 Q. Did Dave say he spoke with anyone 23 else at Guidepoint? 24 A. No. 25 Q. If you could look, the next page</p>	<p style="text-align: right;">Page 81</p> <p>1 F. JIBRIL, M.D. 2 Q. And who told you that Guidepoint 3 ultimately hired a man for that position? 4 A. Valentia. 5 Q. During your June 2018 call? 6 A. I believe so. 7 Q. And you, again, came to learn 8 later that there were multiple people hired 9 for that position? 10 A. Yes. 11 Q. Did Valentia identify the man that 12 was hired for the position as alleged in 13 Paragraph 15? 14 A. I believe she did. 15 Q. And who was that person? 16 A. I don't recall. I believe she 17 told me that it was someone who had a 18 personal connection to Albert Sebag. 19 Q. And that person was hired for the 20 position that you were applying for. 21 A. Yes. 22 Q. Paragraph 16: In a meeting on 23 March 12, 2018 -- "In a memorandum dated 24 March 12, 2018, Valletti detailed her 25 allegations of discrimination to the</p>

<p style="text-align: right;">Page 82</p> <p>1 F. JIBRIL, M.D. 2 director of human resources, Priscilla 3 Gulino. Valletti included the company's 4 failure to hire Jibril, who Valletti 5 described as extremely qualified female 6 candidate, following a severe personal 7 intervention by Sebag. Valletti stated that 8 Guidepoint refused to allow her to discuss 9 or defend the choice of Jibril." 10 Do you see that, doctor? 11 A. Yes. 12 Q. Do you agree with those 13 allegations? 14 A. Yes. 15 Q. And this memorandum, was this the 16 complaint that Ms. Valletti was talking to 17 you about on your call? 18 A. No, this was an email that she had 19 sent I believe to the HR department when she 20 was still at Guidepoint. 21 Q. Okay. 22 So the memorandum mentioned in 23 Paragraph 16 you understand to be an email 24 from Valentia to HR. 25 A. Yes.</p>	<p style="text-align: right;">Page 84</p> <p>1 F. JIBRIL, M.D. 2 A. Yes. 3 Q. And two of them are woman? 4 A. Yes. 5 Q. Including Ms. Valletti. 6 A. Yes. 7 Q. Who told you that Albert told her 8 that he would not hire a female. 9 A. Yes. 10 Q. There -- and it also alleges that 11 Valletti stated that "Guidepoint refuses to 12 allow her to discuss or defend the choice of 13 Jibril." Do you see that? 14 A. Yes. 15 Q. Do you believe that allegation? 16 A. I do. 17 Q. Do you recall your testimony 18 earlier where James said that Valletti and 19 Pool had gone to bat for you? 20 A. Yes. 21 Q. And how would you reconcile that 22 testimony with that allegation? 23 A. I wasn't there, but that is the 24 exact language that James communicated to me 25 on that phone call. He said that they went</p>
<p style="text-align: right;">Page 83</p> <p>1 F. JIBRIL, M.D. 2 Q. And Valletti let you know that 3 there was also a complaint? 4 A. I believe she told me that there 5 was an EEOC complaint, yes. 6 Q. Valletti told you that she had 7 filed an EEOC complaint? 8 A. Yes. 9 Q. In your talking with Valletti in 10 June of 2018, did she mention something 11 along the lines of a severe personal 12 intervention by Sebag? 13 A. Yes. 14 Q. And how did she describe that 15 intervention? 16 A. She said that when he learned 17 that, um, they had planned to hire a female 18 candidate for the role, he immediately began 19 to complain and say that it would not 20 happen. 21 Q. And who did he make those 22 complaints to? 23 A. Valentia and Bouker. 24 Q. And you interviewed in person with 25 four people when you visited Guidepoint?</p>	<p style="text-align: right;">Page 85</p> <p>1 F. JIBRIL, M.D. 2 to bat for me for the decision to hire me. 3 Q. Did you ever have occasion to meet 4 Ms. Gulino? 5 A. No. 6 Q. If you could look at Page 8, 7 doctor. 8 A. (Perusing.) 9 Q. Paragraph D. Section D. 10 A. (Perusing.) 11 Q. Here, the plaintiff's, being you 12 and Ms. Valletti, ask for direction to 13 defendant to place Plaintiff's in the 14 position they would have continued to occupy 15 but for Defendant's discriminatory and 16 retaliatory treatment of them and make them 17 whole for all earnings they would have 18 received but for Defendant's discriminatory 19 and retaliatory treatment including but not 20 limited to wages, bonuses, pensions, and 21 other lost benefits. Do you see that? 22 A. Yes. 23 Q. And do you agree with that request 24 for relief? 25 A. I do.</p>

<p style="text-align: right;">Page 86</p> <p>1 F. JIBRIL, M.D. 2 Q. Would you accept an employment 3 position from Guidepoint if one were offered 4 to you today? 5 A. Yes. 6 Q. Why? 7 A. Because I think that I would be a 8 great fit for that role. 9 Q. And if that role offered \$140,000 10 base with no chance for bonus, you would 11 accept that position? 12 A. Yes. 13 Q. Why? 14 A. Because it is a role that uses my 15 experience very well and broadens what I do. 16 One of the reasons why I was interested in 17 the role was being able to have access to 18 financial industry clients. 19 Q. Walk me through how your daily 20 functions at Expert differ from what you 21 understood the health care content 22 strategist to be. 23 A. Well, currently at the Expert 24 Institute, what I do is business 25 development. I'm prospecting and pitching</p>	<p style="text-align: right;">Page 88</p> <p>1 F. JIBRIL, M.D. 2 Q. Valentia told you that she earned 3 bonuses. 4 A. Yes. 5 Q. And it was your understanding that 6 bonuses might be in your future if you 7 joined Guidepoint. 8 A. Yes. 9 Q. And the position you were 10 interviewing for was subordinate to 11 Ms. Valletti. 12 A. Yes. 13 Q. In the allegation here to make you 14 whole for all earnings you would have 15 received but for Defendant's discriminatory 16 treatment, Dr. Jibril, how have you been 17 damaged financially by Guidepoint's refusal 18 to hire you? 19 A. At the time that I was 20 interviewing with Guidepoint, my salary was 21 \$87,500, so the role at Guidepoint would 22 have been a significant increase in that. 23 There was a period of time where I 24 would demonstrate a loss. By June of that 25 year, I did receive a raise to \$100,000, so</p>
<p style="text-align: right;">Page 87</p> <p>1 F. JIBRIL, M.D. 2 clients. Very limited usage of my health 3 care background. 4 The role that I was interviewing 5 for was health care content strategist, 6 which is how I started my career at The 7 Expert Institute using health care knowledge 8 and applying it in a different way. 9 Q. And your base at Expert is now 10 \$140-. 11 A. Yes. 12 Q. And you understood the salary 13 range for the position you were interviewing 14 at Guidepoint to be between \$140- and \$160-. 15 A. Yes. 16 Q. And at Expert, you're entitled to 17 bonuses that might raise your compensation 18 is to \$333,000. 19 A. Yes. 20 Q. And it was your understanding that 21 you would not be earning bonuses when you 22 first began at Guidepoint. 23 A. That wasn't explicitly discussed, 24 but I was willing to take a role for base 25 pay.</p>	<p style="text-align: right;">Page 89</p> <p>1 F. JIBRIL, M.D. 2 that's where the damages would end, at that 3 point. 4 Q. And then your base increased to 5 \$140- at Expert. 6 A. Yes, the following year. 7 Q. Dr. Jibril, I'm going to show you 8 what's been marked as Defendant's Exhibit G 9 (handing). 10 A. (Perusing.) 11 Q. Doctor, if you could just review 12 Defendant's G and let us know when you've 13 had an opportunity to do that. 14 A. (Perusing.) 15 Yes. 16 Q. You've had an opportunity to 17 review G? 18 A. I have. 19 Q. Do you recognize G? 20 A. I have not seen this document 21 before. 22 Q. I'll represent to you that it's a 23 letter my office received from your counsel 24 as part of this litigation. 25 Doctor, if I could refer you to</p>

<p style="text-align: right;">Page 90</p> <p>1 F. JIBRIL, M.D. 2 that bulleted list, 3B. 3 A. Uh-huh. 4 Q. "Valletti has lost \$165,000 in 5 backpay damages, and Jibril has lost \$61,900 6 in backpay damages. Plaintiffs are also 7 seeking damages for emotional distresses, 8 punitive damages, attorney fees, costs, and 9 disbursements." 10 You see that doctor? 11 A. Yes. 12 Q. Doctor, were your damages as of 13 February 20, 2019, the date of this letter, 14 \$61,900? 15 A. I believe so. 16 Q. And how did you calculate that? 17 A. Lost earnings between the time 18 when my salary was \$87,500 up until the time 19 six months later it was increased to 20 \$100,000, and then the subsequent six months 21 before it was increased again to \$140-. 22 Q. So as of the date of this 23 February 20, 2019, letter you're already in 24 a position as VP at Expert? 25 A. No -- yes, I was.</p>	<p style="text-align: right;">Page 92</p> <p>1 F. JIBRIL, M.D. 2 (handing). They work together, so we could 3 look at them together. If you could just 4 look at them sort of at the same time and 5 let us know when you've had a chance to do 6 that, please. 7 A. Okay (perusing). 8 I have had an opportunity to take 9 a look at the exhibits. 10 Q. Okay. 11 And in speaking first about 12 Exhibit A, do you recognize Exhibit A? 13 A. Yes. 14 Q. And what do you recognize 15 Exhibit A to be? 16 A. This is the defendant's first set 17 of interrogatories. 18 Q. Have you seen this document before 19 today? 20 A. Yes. 21 Q. Same questions about Exhibit B: 22 Do you recognize Exhibit B? 23 A. Yes. 24 Q. And what do you recognize 25 Exhibit B to be?</p>
<p style="text-align: right;">Page 91</p> <p>1 F. JIBRIL, M.D. 2 Q. And you have a base of \$140-. 3 A. Yes. 4 Q. And do you know what compensation 5 level for the position at Guidepoint was 6 used to calculate the \$61,900? 7 A. I believe it was based on salary 8 \$140- to \$160,000. 9 Q. And you agree with that 10 calculation, \$61,900? 11 A. Yes. 12 Q. And that would have been the 13 difference between what you would have 14 earned at Guidepoint in or about February of 15 2018 to date? 16 A. Yes. 17 Q. Less what you have earned at 18 Expert. 19 A. Yes. 20 Q. As reflected in your promotions in 21 that period of time. 22 A. Correct. 23 Q. I'm going to show -- doctor, I'm 24 going to show you what's been previously 25 marked as Defendant's Exhibits A and B</p>	<p style="text-align: right;">Page 93</p> <p>1 F. JIBRIL, M.D. 2 A. The plaintiffs' response to the 3 defendant's interrogatories. 4 Q. And have you seen Exhibit B 5 before? 6 A. Yes. 7 Q. And you understand Exhibit B to be 8 your answer to the questions in Exhibit A as 9 part of this litigation. 10 A. Yes. 11 Q. Doctor, if you could turn in 12 Exhibit A to Page 7, Interrogatory Number 5. 13 A. (Perusing.) 14 Q. Interrogatory Number 5 asks with 15 respect to you employment history for the 16 five years prior to your employment with 17 Guidepoint to the present identify (A) your 18 employer's and the date during which you 19 were employed, (B) your supervisors, and (C) 20 any person performing any evaluation, 21 formal/informal of your work performance. 22 Do you see that. 23 A. Yes. 24 Q. And I think we have done a good 25 job of covering your employment during that</p>

<p style="text-align: right;">Page 94</p> <p>1 F. JIBRIL, M.D. 2 time period. 3 Doctor, who is your current 4 supervisor at Expert? 5 A. Joaquin Santos. 6 Q. And what is Mr. Santos' position? 7 A. He's a senior vice president of 8 business development. 9 Q. Do you have any other supervisors 10 other than Mr. Santos? 11 A. No. 12 Q. And going sort of back in time 13 before you become vice president of 14 enterprise and you are on the business 15 development team, who was your supervisor 16 then? 17 A. Dave Glynn. 18 Q. Did you have any other supervisors 19 at the time? 20 A. No. 21 Q. And what was Dave's title at that 22 time? 23 A. Vice president of business 24 development. 25 Q. Did you have a different manager</p>	<p style="text-align: right;">Page 96</p> <p>1 F. JIBRIL, M.D. 2 Expert, who was your supervisor? 3 A. Michael Morgenstern. 4 Q. And what was Mr. Morgenstern's 5 tile then? 6 A. Then, it was vice president of 7 marketing. 8 Q. Now, did these supervisors have 9 occasion to perform evaluations of your work 10 performance? 11 A. The only supervisor that gave me 12 evaluations was Zachary Baretto in my role 13 on the research team. 14 Q. Sort of beginning of your tenure 15 at Expert? 16 A. When I became full-time at Expert 17 Institute. 18 Q. And do you recall the content of 19 those evaluations? 20 A. Yes, they were largely positive. 21 Q. Do you have copies of those 22 evaluations? 23 A. No. 24 Q. Doctor, if you could look at 25 Interrogatory Number 7.</p>
<p style="text-align: right;">Page 95</p> <p>1 F. JIBRIL, M.D. 2 when you had started performing more of the 3 account management roles? 4 A. No. 5 Q. Sorry. Did you have a different 6 supervisor? 7 A. I didn't. 8 Q. Was it still Mr. Glynn? 9 A. Yes. 10 Q. And when you were the associate 11 director of the medical research department, 12 who was your supervisor then? 13 A. Zachary Baretto, Z-A-C-H-A-R-Y 14 B-A-R-E-T-T-O. 15 Q. And what was Mr. Baretto's title 16 at that time? 17 A. Vice president of research. 18 Q. And in your position as senior 19 medical research associate, who was your 20 supervisor then? 21 A. Zachary Baretto. 22 Q. Was he still -- was he at that 23 time VP of research? 24 A. Yes. 25 Q. And when you first began at</p>	<p style="text-align: right;">Page 97</p> <p>1 F. JIBRIL, M.D. 2 A. (Perusing.) 3 Q. Interrogatory 7 asks if you have 4 made an application or inquiry for 5 employment to any person or entity since 6 your separation or rejection of employment 7 from Guidepoint, and then it's asked that 8 Plaintiffs identify certain factors, 9 elements. 10 Doctor, we spoke about your 11 conversations for the Guidepoint business 12 development team in the spring of this year, 13 correct? 14 A. Yes. 15 Q. And we talked about your 16 recruitment by others in 2017; is that 17 correct? 18 A. Yes. 19 Q. Could you walk us through any 20 applications for employment you have made in 21 2018? 22 A. I did not make any applications. 23 Q. Did you receive inquiries for 24 employment during 2018? 25 A. Yes.</p>

<p style="text-align: right;">Page 98</p> <p>1 F. JIBRIL, M.D. 2 Q. And how many inquiries? 3 A. I think roughly four. 4 Q. And who were those received from? 5 A. I can't recall all the employers. 6 The one that does come to mind is the 7 translation and interpretation service. 8 Q. So is there some overlap between 9 this and the 2017 recruiters we talked about 10 before? 11 A. I'm sorry. You're referring to 12 2018? 13 Q. Just 2018 -- 14 A. Okay. 15 Q. -- alone. 16 A. Then no. 17 Q. So in 2018, you receive no 18 inquiries for employment. 19 A. I did speak with Anna Kogut at the 20 end of 2018. 21 Q. And Anna, is that the law firm? 22 A. Yes. 23 Q. Is that the same position we 24 talked about before? 25 A. Yes.</p>	<p style="text-align: right;">Page 100</p> <p>1 F. JIBRIL, M.D. 2 Q. And this position would still 3 require you to commute to New Jersey? 4 A. Yes, although they did inform me 5 that they were opening a Manhattan office, 6 so that would be a potential. 7 Q. Okay. 8 And who did you interview with at 9 the law firm? 10 A. The COO, the, um, firm 11 administrator, and the recruiter. 12 Q. Ms. Kogut? 13 A. Yes. 14 Q. And do you recall the name of the 15 COO? 16 A. I don't. 17 Q. Do you recall the name of the firm 18 admin? 19 A. I don't. 20 Q. And when did you have this 21 interview? 22 A. It was right before the holidays 23 in December of 2018. 24 Q. And what was the result of 25 those -- that interview.</p>
<p style="text-align: right;">Page 99</p> <p>1 F. JIBRIL, M.D. 2 Q. All right. 3 So are those 2017 recruiter talks 4 really 2018, or was there some overlap? 5 A. No, I spoke with her in 2018 and 6 2017. 7 Q. For the same position? 8 A. Yes, though higher ranking. 9 Q. What was the difference in the 10 positions that Ms. Kogut was bringing to 11 your attorney? 12 A. Seniority. This would be a 13 position -- the second time she reached out 14 to me would be a position that was directly 15 reporting to the COO. 16 Q. So when Ms. -- you and Ms. Kogut 17 spoke in 2017, it was about one position, 18 and when you spoke in 2018, it was about a 19 more senior position? 20 A. Yes. 21 Q. And how did those talks about the 22 senior position go? 23 A. They were -- they went a lot 24 further this time. I interviewed in person 25 at their New Jersey office.</p>	<p style="text-align: right;">Page 101</p> <p>1 F. JIBRIL, M.D. 2 A. They extended an offer. 3 Q. And what was the nature of the 4 offer? 5 A. I believe it was a base -- the 6 initial offer was \$180- base, and after 7 negotiation, it was \$210- base. Bonus 8 potential was not defined. 9 Q. And when was the officer extended? 10 A. In December. 11 Q. And what would this title have 12 been? 13 A. I believe it would have been 14 director of business development. 15 Q. And you would have reported 16 directly to COO? 17 A. Yes. 18 Q. And they're initial officer was 19 \$180-? 20 A. Yes. 21 Q. Were you represented by another 22 recruiter in these negotiations, or you're 23 representing yourself? 24 A. I represented myself. 25 Q. And you negotiated up to \$210-?</p>

<p style="text-align: right;">Page 102</p> <p>1 F. JIBRIL, M.D. 2 A. Yes. 3 Q. And they ultimately did not accept 4 that offer, correct? 5 A. They did -- oh, I did not. 6 Q. Sorry. 7 You ultimately did not accept that 8 offer, correct? 9 A. Yes. 10 Q. And why not? 11 A. When I reached out to the CEO, 12 CTO, and CMO of my current employer to let 13 them know there was a very attractive offer 14 on the table for me, they were very sad to 15 see me go. We had a lunch meeting, and we 16 discussed my future at the company. 17 Given that I'm one of the more 18 tenured employees, we discussed the future 19 of the company, and they raised my salary 20 and title. And though it was significantly 21 less in base, um, I enjoy my work, and I saw 22 a potential in a new role that they gave me, 23 so I decided to stay. 24 Q. So that is what led to your 25 January 2019 promotion to vice president and</p>	<p style="text-align: right;">Page 104</p> <p>1 F. JIBRIL, M.D. 2 A. Yea. 3 Q. Right. 4 A. And a recruiter from LinkedIn 5 reached out about a business development 6 role. 7 Q. And correct me if I'm wrong. Were 8 there two recruiters from Guidepoint, or is 9 it one Guidepoint and the third party? 10 A. One Guidepoint and one third-party 11 recruiter. 12 Q. And they ended up talk about the 13 same position. 14 A. Yes. 15 Q. Okay. 16 And the recruiter from LinkedIn, 17 what did they, he or she, reach out to you 18 about? 19 A. She reached out about a business 20 development role, as well. 21 Q. Okay. 22 Where was that role? 23 A. At their headquarters in 24 Manhattan. 25 Q. And this was an in-house</p>
<p style="text-align: right;">Page 103</p> <p>1 F. JIBRIL, M.D. 2 the bump in base salary? 3 A. Correct. 4 Q. Okay. 5 And I assume you ultimately 6 declined the offer from the firm? 7 A. Yes. 8 Q. In 2018, did you receive any other 9 inquiries for employment other than that law 10 firm? 11 A. Yes, but, again, I can't recall 12 and none of those discussions went beyond 13 initial phone screenings. 14 Q. Again, we're talking just 2018. 15 A. Yes. 16 Q. And how many inquiries would you 17 say in 2018? 18 A. Roughly four. 19 Q. All right. 20 Let's talk about 2019, then. Had 21 you made any applications for employment in 22 2019? 23 A. Two recruiters from -- on behalf 24 of Guidepoint reached out to me. 25 Q. And we talked about that earlier.</p>	<p style="text-align: right;">Page 105</p> <p>1 F. JIBRIL, M.D. 2 recruiter? 3 A. Yes. 4 Q. And what sort of business? 5 A. So it was gaining -- reaching out 6 to corporate clients, not on the member side 7 of things. 8 Q. And I'm sorry. In what capacity 9 to corporate clients? 10 A. So LinkedIn has an arm of their 11 business where they're reaching out to 12 corporations selling their services. 13 Q. Oh, I see. All right. So the 14 recruiter was from LinkedIn. 15 A. Oh, yes. 16 Q. Okay. It wasn't -- 17 A. She reached out to me on LinkedIn, 18 but the role was at -- 19 Q. I see. 20 A. -- LinkedIn. 21 Q. A communication through LinkedIn 22 about LinkedIn. 23 A. Yes. 24 Q. Okay. 25 That was a position to be at</p>

<p style="text-align: right;">Page 106</p> <p>1 F. JIBRIL, M.D. 2 LinkedIn. 3 A. Yes. 4 Q. Okay. 5 Did you have talks with that 6 recruiter about that potential compensation? 7 A. Yes. 8 Q. And what was that compensation? 9 A. I told her what my potential 10 earnings for 2019 was, and we immediately 11 saw that the role was not a good fit. 12 Q. It wouldn't have matched your 13 compensation at Expert? 14 A. Exactly. 15 Q. So 2019, we've talked about 16 Guidepoint. We've talked about LinkedIn. 17 Any other employment opportunities in 2019? 18 A. No. 19 Q. Interrogatory 8: If you've 20 received any offers of employment since the 21 date of your separation or rejection of 22 employment from Guidepoint, and then it asks 23 to identify in more specificity. 24 So Dr. Jibril, your -- we'll call 25 it rejection of employment from Guidepoint</p>	<p style="text-align: right;">Page 108</p> <p>1 F. JIBRIL, M.D. 2 Doctor, it asks, with respect to each and 3 every measure of damages sought in the 4 Complaint, including but not limited to 5 economic losses, emotional pain and 6 suffering, and punitive damages, and then 7 again it asks for identity of certain 8 specifications. 9 With this question, if I could 10 also ask you to refer to Exhibit B, which 11 are Plaintiffs' responses to the 12 interrogatories, specifically Response 11, 13 and that is responsive to Question 11. 14 And at -- do you have Response 11? 15 A. Yes. 16 Q. And in Response 11, it reads: 17 "Valletti is owed \$334,000 in backpay, and 18 Jibril is owed \$48,000 in backpay. 19 Plaintiffs are also seeking reinstatement, 20 punitive damage, attorneys' fees, costs, 21 disbursements, and interests. 22 "Plaintiffs are not seeking 23 compensation for mental and emotional 24 distress." Do you see that? 25 A. Yes.</p>
<p style="text-align: right;">Page 107</p> <p>1 F. JIBRIL, M.D. 2 was in February of 2018, correct? 3 A. Yes. 4 Q. And what offers for employment 5 have you received since February of 2018? 6 A. The one that we discussed at the 7 end of 2018 from the law firm. 8 Q. Doctor, if you could look at 9 Interrogatory 10. 10 A. (Perusing.) 11 Q. State whether you have received 12 any unemployment benefits, Social Security 13 benefits, disability benefits, workers' 14 compensation benefits, or any other types of 15 government benefits since the date of your 16 separation from Guidepoint. If so, identify 17 the type of benefit, the date the benefit 18 was received and the total amount of the 19 benefit. Do you see that question? 20 A. Yes. 21 Q. Dr. Jibril, you've had no break in 22 employment since school, correct? 23 A. Yes. 24 Q. Okay. 25 Continuing onto Interrogatory 11:</p>	<p style="text-align: right;">Page 109</p> <p>1 F. JIBRIL, M.D. 2 Q. And do you agree with that 3 response? 4 A. Yes. 5 Q. And how are we calculating \$48,000 6 in backpay now? 7 A. The numbers are the same. I was 8 earning \$87,500 at the time when I was 9 rejected the role at Guidepoint, and up 10 until June or July of 2018, I was making 11 \$87,500; that was increased to \$100,000, and 12 then again by the end of the year, \$140-. 13 Q. And if I could ask you: At the 14 time we're looking at this Exhibit B to also 15 refer back to Exhibit G. 16 A. (Perusing.) 17 Q. And in Exhibit G, we talked about 18 the calculation of your damages at \$61,900, 19 correct? 20 A. Yes. 21 Q. And could you explain to us the 22 difference in the calculation reflected in 23 Exhibit G and then reflected in Exhibit B? 24 A. One may be an error, but the 25 calculations for backpay are based on my</p>

<p style="text-align: right;">Page 110</p> <p>1 F. JIBRIL, M.D. 2 salary at the various times between the 3 rejection and to this date. 4 Q. Your salary at Expert has also 5 increased during that period of time, 6 correct? 7 A. Correct, and so there is a cut-off 8 point for the damages. 9 Q. And what do you understand that 10 cut-off point to be? 11 A. January of 2019 when my base pay 12 was increased to \$140,000. 13 Q. So your backpay period would be 14 from February 2018 to January of 2019? 15 A. Yes. 16 Q. What is your understanding of the 17 request here for punitive damages? 18 A. I'm sorry. Could you clarify that 19 question? 20 Q. Do you understand what punitive 21 damages are? 22 A. Yes. 23 Q. What are punitive damages? 24 A. Damages assessed on a defendant 25 based on discriminatory behavior in this</p>	<p style="text-align: right;">Page 112</p> <p>1 F. JIBRIL, M.D. 2 A. Yes. 3 Q. In Exhibit B, Dr. Jibril, can you 4 turn to the first page, Response 1? 5 A. (Perusing.) 6 Q. Do you see Response 1? 7 A. Yes. 8 Q. Certain names are listed there? 9 A. Yes. 10 Q. Do you know who Jessica Kagan 11 Trupia [phonetic] is? 12 A. No. 13 Q. Do you know who Jenna Applebaum 14 is? 15 A. No. 16 Q. Ashley Dunston is? 17 A. No. 18 Q. Have you come to learn of any 19 other individuals that have applied for 20 employment with Guidepoint? 21 A. No. 22 Q. In your talks with Ms. Valletti, 23 did she say that in her application for 24 employment with Guidepoint, she experienced 25 gender-based discrimination?</p>
<p style="text-align: right;">Page 111</p> <p>1 F. JIBRIL, M.D. 2 instance or other negligence in other types 3 of litigation. 4 Q. And do you believe the conduct 5 you've alleged against Guidepoint warrants 6 the imposition of punitive damages? 7 A. I do. 8 Q. How so? 9 A. I think that denying someone 10 employment based on their sex is 11 unacceptable and illegal. 12 Q. And it was Ms. Valletti that told 13 you that she believed you were not extended 14 the offer because of your gender, correct? 15 A. Correct. 16 Q. And it was Ms. Valletti that told 17 you that it was ultimately a man that was 18 fired for that position; is that correct? 19 A. Correct. 20 Q. And you later learned that it was 21 15 individuals hired for that position. 22 A. Yes. 23 Q. And you understood that at the 24 time Ms. Valletti was terminated, Mr. Pool 25 was also terminated; is that correct?</p>	<p style="text-align: right;">Page 113</p> <p>1 F. JIBRIL, M.D. 2 A. No. 3 Q. Do you have any idea of the senior 4 management structure at Guidepoint? 5 A. I do not. 6 Q. Would it surprise you to learn 7 that there are two female members of that 8 senior management team? 9 A. How many members total are there? 10 Q. Five. 11 A. Okay. 12 I -- I was not aware of the 13 structure. 14 Q. If I make the representation that 15 two of the five members of Guidepoint senior 16 management team are female, would that come 17 as a surprise to you? 18 A. Yes. 19 Q. And why would that be surprising? 20 A. Given what I know about the 21 company and its treatment of female 22 employees, at least during the time that 23 Valentia was employed and the time that I 24 was interviewing. 25 Q. So Valentia shared with you her</p>

<p style="text-align: right;">Page 114</p> <p>1 F. JIBRIL, M.D. 2 impressions of how she was treating, 3 correct? 4 A. Correct. 5 Q. Did Valentia share with you of how 6 any other female employees were treated? 7 A. Yes. 8 Q. And which employees? 9 A. She made mention of the person who 10 preceded her in her role. She said that 11 that employee was terminated during 12 maternity leave or their role was severely 13 diminished when they returned from maternity 14 leave. And she made reference of other 15 individuals who had been treated unfairly on 16 the basis of their sex. 17 Q. When did Ms. Valletti share this 18 with you? 19 A. In June of 2017. 20 Q. Or was it -- 21 A. Sorry. 2018, yes. 22 Q. And did just provide any more 23 details other than the employee on maternity 24 leave, these other individuals that she 25 believes were discriminated against?</p>	<p style="text-align: right;">Page 116</p> <p>1 F. JIBRIL, M.D. 2 share with you? 3 A. She said that female employees 4 were treated unfairly, including the 5 employee that we mentioned whose employment 6 was -- status was reduced after coming back 7 from maternity leave. 8 She also told me that the CEO was 9 in a relationship with one of the employees 10 and would bring her, the secretary, to 11 business trips inappropriately, and, um, act 12 inappropriately in the office, which made 13 people uncomfortable, herself included. 14 Q. And you had no personal knowledge 15 of this employee on maternity leave, right? 16 A. No. 17 Q. And you had no personal knowledge 18 of any secretaries at Guidepoint, correct? 19 A. No. 20 Q. Did Ms. Valletti tell you who the 21 secretary was? 22 A. She probably did mention her name, 23 but I don't recall it. 24 Q. Are there any allegations in your 25 complaint about Mr. Sebag's relationship</p>
<p style="text-align: right;">Page 115</p> <p>1 F. JIBRIL, M.D. 2 A. Yes, I think there were more than 3 just two examples. She let me know that 4 there was conduct by some of the senior 5 management that was problematic in regards 6 to treatment of female employees, displays 7 of, you know, interpersonal relationships in 8 the office. Things of that nature. 9 Q. And Ms. Valletti shared all of 10 this with you on that call of June of 2018? 11 A. Yes, or if not all during that 12 call, then subsequent conversations. 13 Q. When you later met with her in 14 person? 15 A. Yes. 16 MR. GRECH: Take a five-minute 17 break, please? 18 (Whereupon, a recess was taken at 19 this time.) 20 Q. Dr. Jibril, before the break, you 21 had mentioned that Ms. Valletti shared with 22 you some concerns she had about senior 23 management at Guidepoint; is that correct? 24 A. Yes. 25 Q. And what concerns did Ms. Valletti</p>	<p style="text-align: right;">Page 117</p> <p>1 F. JIBRIL, M.D. 2 with the secretary or acting 3 inappropriately? 4 A. I don't believe so. 5 Q. Ms. Valletti believed this was 6 further evidence of gender discrimination at 7 Guidepoint? 8 A. I think it's further evidence of 9 improper conduct. 10 Q. Is it further evidence of gender 11 discrimination? 12 A. I think you could argue that, yes. 13 Q. Are you arguing that? 14 A. Yes. 15 Q. But you've never met Mr. Sebag. 16 A. No. 17 Q. You have no knowledge of his 18 relationships with anybody. 19 A. No. 20 Q. Or taking anyone on business 21 trips. 22 A. Correct. 23 Q. Anything else that Ms. Valletti 24 shared with you in terms of senior 25 management and interpersonal relationships</p>

<p style="text-align: right;">Page 118</p> <p>1 F. JIBRIL, M.D. 2 that she felt was evidence of gender 3 discrimination? 4 A. She felt that she was treated 5 unfairly by Mr. Sebag. 6 Q. How so? 7 A. That he would have outbursts in 8 her presence at her frequently. 9 Q. And Ms. Valletti shared this with 10 you in June 2018? 11 A. Yes, and in subsequent 12 conversations. 13 Q. I'm assuming she didn't share any 14 of this during her interview, correct? 15 A. Correct. 16 Q. This would have been something you 17 would have wanted to know when you're asking 18 about this new employer and this team? 19 A. Yes, cultural fit is important. 20 Q. And knowing this, at least knowing 21 this through Ms. Valletti, you're still of 22 the opinion that you would like to work for 23 Guidepoint? 24 A. Yes. 25 Q. We spoke earlier about what you</p>	<p style="text-align: right;">Page 120</p> <p>1 F. JIBRIL, M.D. 2 Q. When did you first get that idea? 3 A. When Valentia, the hiring manager, 4 told me I was not hired because of my sex. 5 Q. And that happened in June. 6 A. Yes. 7 Q. In your conversations with 8 Ms. Valletti in June of 2018, did she ask 9 you to essentially join her lawsuit against 10 Guidepoint? 11 A. No, she did not. 12 Q. But you ultimately did, both, sue 13 Guidepoint. 14 A. Yes. 15 Q. And you both submitted charges to 16 the EEOC. 17 A. Yes. 18 Q. Do you still speak with 19 Ms. Valletti today? 20 A. Yes. 21 Q. How frequently? 22 A. Maybe once every few months as 23 relates to the litigation. 24 Q. Do you have occasion to speak with 25 Ms. Valletti outside of talks of the</p>
<p style="text-align: right;">Page 119</p> <p>1 F. JIBRIL, M.D. 2 had planned your response to be when you 3 learned that your offer had been vetoed and 4 that you had thought about reaching out to 5 HR, correct? 6 A. Yes. 7 Q. But you did not ultimately do 8 that. 9 A. Correct. 10 Q. What were you going to ask HR? 11 A. I would have asked for specific 12 feedback on my candidacy, what was lacking, 13 and why the decision was made to interview a 14 current client of mine and a current direct 15 supervisor of mine for a role that I was not 16 ultimately going to be offered. 17 Q. And this would have been response 18 to you learning of the veto in February 19 2018. 20 A. Yes. 21 Q. At that point, did you believe 22 that officer wasn't extended because you 23 were a woman? 24 A. I had no idea why it wasn't 25 extended at that time.</p>	<p style="text-align: right;">Page 121</p> <p>1 F. JIBRIL, M.D. 2 litigation? 3 A. No. 4 Q. Do you consider her a friend? 5 A. By -- I would say yes, we're 6 friendly. 7 Q. Do you go out on social events 8 together? 9 A. No. 10 Q. Have dinner together? 11 A. No. 12 Q. Meet for coffee? 13 A. Yes, we have. 14 Q. And this has been between 15 February 2018 and date -- 16 A. Yes. 17 Q. Strike that. 18 Has this been since June 2018 to 19 present? 20 A. Correct. Yes. 21 Q. Dr. Jibril, if I could ask you to 22 look at -- back at Defendant's Exhibit B for 23 a moment. 24 A. (Perusing.) 25 Q. And specifically Response Number</p>

<p style="text-align: right;">Page 122</p> <p>1 F. JIBRIL, M.D. 2 11. 3 A. (Perusing.) 4 Yes. 5 Q. The description of the damages for 6 which Plaintiffs are seeking relief. We 7 discussed reinstatement. We discussed 8 punitive damages. It also itemizes 9 attorneys' fees. Do you see that? 10 A. Yes. 11 Q. And have you incurred attorneys' 12 fees as a result of this litigation? 13 A. Not yet. 14 Q. Why not yet? 15 MR. LICHTEN: I'd object. 16 What is the relevance of the 17 agreement with her attorney? 18 MR. GRECH: You're seeking 19 attorneys' fees in damages. 20 MR. LICHTEN: Yeah, under the 21 Lodestar -- it doesn't really matter 22 when they first actually paid and what 23 they actually owe. That's not how fees 24 are calculated in this case. 25 MR. GRECH: That's in your</p>	<p style="text-align: right;">Page 124</p> <p>1 F. JIBRIL, M.D. 2 terminated from employment. 3 Q. Okay. 4 And you ultimately filed a charge 5 of discrimination with the Equal Employment 6 Opportunity Commission. 7 A. Yes. 8 Q. Did Ms. Valletti tell you that she 9 had done the same? 10 A. Yes. 11 Q. And she told you that in June of 12 2018? 13 A. Yes. 14 Q. So it had already been done, 15 presumably. 16 A. Yes. 17 Q. Did she tell you when she did it? 18 A. No. 19 Q. And we spoke earlier that your 20 charge was -- the EEOC decided not to 21 further pursue your charge; is that correct? 22 A. Yes. 23 Q. And did you have talks with 24 Ms. Valletti about that? 25 A. Yes.</p>
<p style="text-align: right;">Page 123</p> <p>1 F. JIBRIL, M.D. 2 application for fees should you 3 prevail. 4 MR. LICHTEN: Correct. 5 MR. GRECH: Okay. 6 MR. LICHTEN: That's all we're 7 asking for. 8 MR. GRECH: Okay. 9 Q. Dr. Jibril, is it your 10 understanding that your attorneys' fees 11 would be paid by Guidepoint should you 12 prevail in this lawsuit? 13 A. That's what we are seeking. 14 Q. How soon after you spoke with 15 Ms. Valletti in June of 2018 did you file 16 your charge with the EEOC? 17 A. It was a few weeks later. 18 Q. Did you get the impression from 19 Ms. Valletti -- strike that. 20 What did Ms. Valletti say to you, 21 if anything, about her charge with the EEOC 22 at that time? 23 A. She let me know that immediately 24 upon raising to HR her concerns about 25 gender-based discrimination, she was</p>	<p style="text-align: right;">Page 125</p> <p>1 F. JIBRIL, M.D. 2 Q. And did you know what came of 3 Ms. Valletti's charge with the EEOC? 4 A. No. Actually, I don't. 5 Q. Okay. 6 Did you have conversations with 7 Ms. Valletti about joining in a lawsuit with 8 her against Guidepoint at that time? 9 A. Yes. 10 Q. Why? 11 A. Because I had been denied 12 employment based on my sex. 13 Q. We've talked about a number of 14 recruiter reaching out to you, a number of 15 applications, some offers. 16 Prior to speaking with Valentia in 17 June of 2018, what in your experience with 18 Guidepoint made you think that their 19 decision was gender-based? 20 A. I really, prior to speaking with 21 Valentia, was perplexed. I had no idea why 22 they had chosen not to move forward. I 23 thought potentially it might be based on my 24 gender, but I didn't -- I had no concrete 25 answers from anyone.</p>

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1 F. JIBRIL, M.D.
2 Q. Did anyone you interviewed with
3 for that position let you know that they
4 were interviewing other applicants?
5 A. No.
6 Q. Did you sit with other applicants
7 in the lobby that day?
8 A. No.
9 MR. GRECH: Take a 30-second
10 break, please.
11 (Whereupon, a recess was taken at
12 this time.)
13 MR. GRECH: Dr. Jibril, thank you.
14 And with that, we've concluded
15 your deposition.
16 THE WITNESS: Thank you.
17 (Time noted: 12:50 p.m.)
18
19 _____
20 Faiza Jibril
21 Subscribed and sworn to before me
22 this ____ day of _____, 20__.
23
24 _____
25 Notary Public

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2 I N D E X
3 WITNESS EXAMINATION BY PAGE
4 Faiza Jibril Mr. Grech 4
5
6 EXHIBITS
7 DEFENDANT'S DESCRIPTION PAGE
8 E Nine-page 59
9 black-and-white
10 Complaint
11 F One-page 59
12 black-and-white Charge
13 of Discrimination
14 G One-page letter from 59
15 Plaintiffs' Counsel
16
17
18
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21
22
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25

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2 C E R T I F I C A T E
3 I, STEPHEN P. SUDANO, a Notary Public in
4 and for the State of New York, do hereby
5 certify:
6 THAT the witness, FAIZA JIBRIL, whose
7 testimony is herein before set forth, was
8 duly sworn by me; and
9 THAT the within transcript is a true
10 record of the testimony given by said
11 witness.
12 I further certify that I am not related,
13 either by blood or marriage, to any of the
14 parties to this action; and
15 THAT I am in no way interested in the
16 outcome of this matter.
17 IN WITNESS WHEREOF, I have hereunto set
18 my hand this 3rd of October 2019.
19
20
21
22 _____
23 STEPHEN P. SUDANO
24
25

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2 ERRATA SHEET
3 CASE NAME: VALENTIA VILLETTI and FAIZA
4 JIBRIL, M.D. V. GUIDEPOINT GLOBAL, LLC
5
6 DATE OF DEPOSITION: October 3, 2019
7
8 WITNESS' NAME: Faiza Jibril
9
10 PAGE/LINE CORRECTIONS (NOW READS/SHOULD READ/REASON)
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18
19 _____
20 Faiza Jibril
21 SUBSCRIBED AND SWORN TO BEFORE ME
22 THIS ____ DAY OF ____, 20__.
23
24 _____
25 NOTARY PUBLIC MY COMMISSION
EXPIRES:

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